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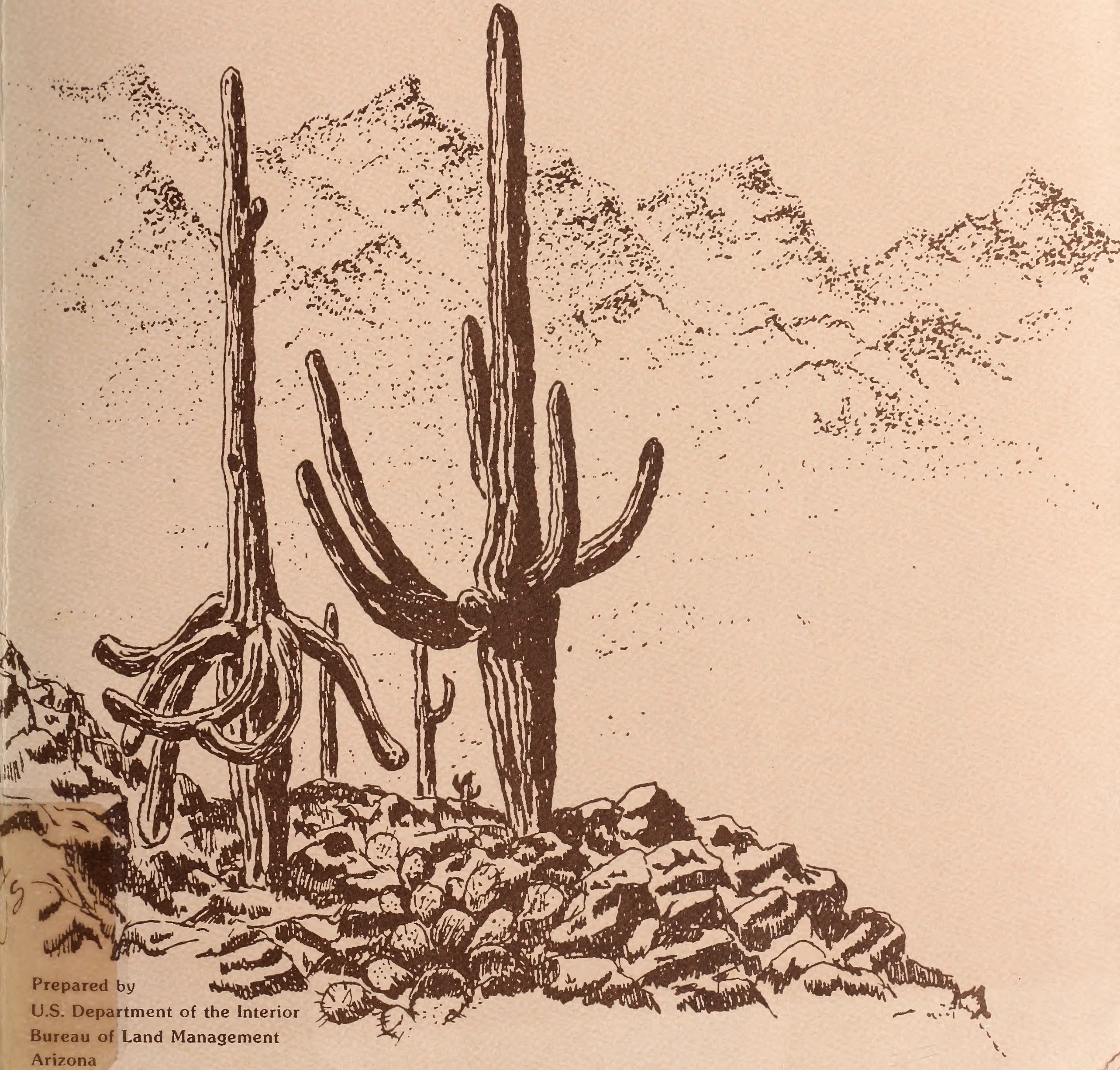
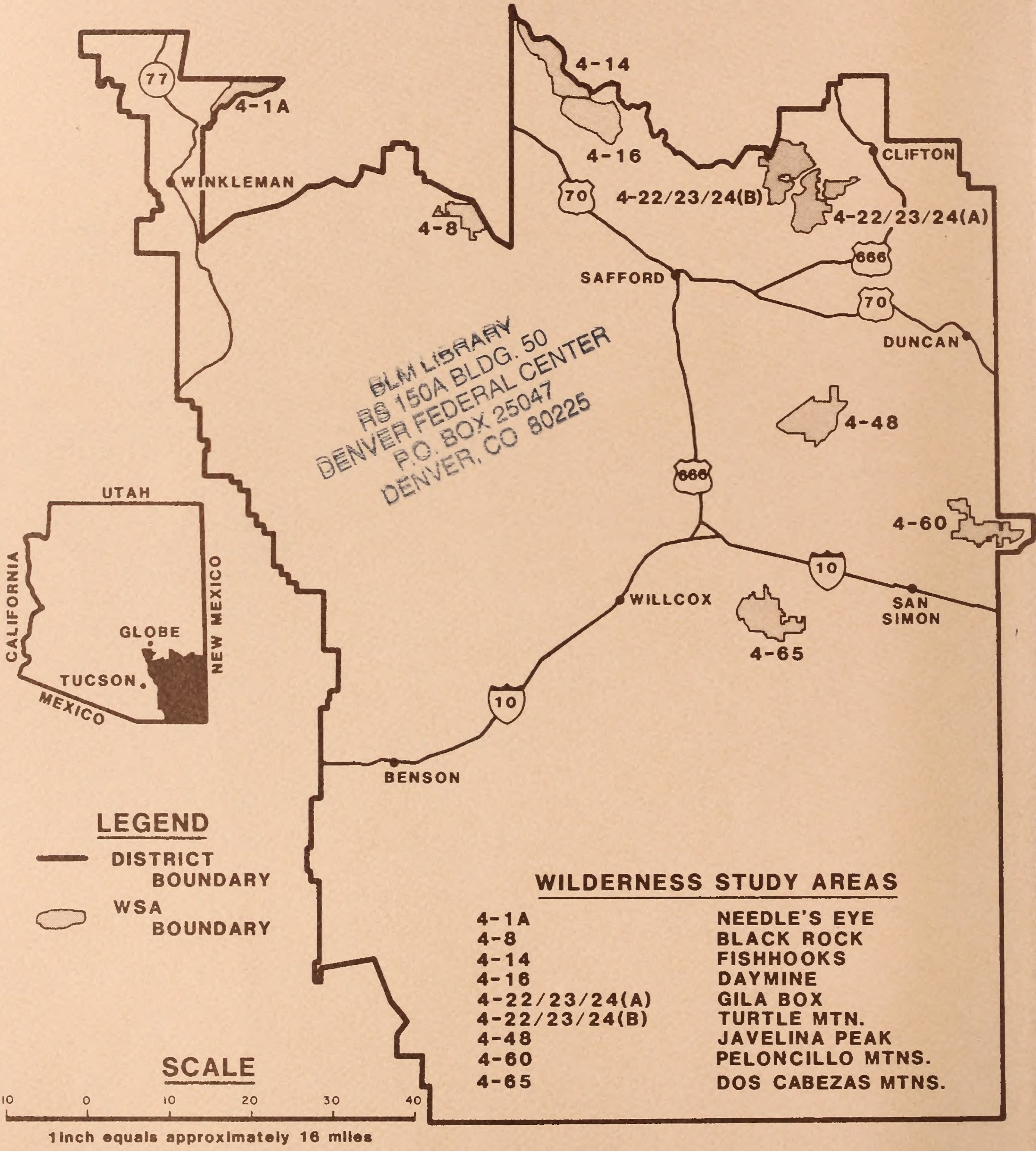
SAFFORD DISTRICT

Final Wilderness Environmental Impact Statement



Prepared by
U.S. Department of the Interior
Bureau of Land Management
Arizona

WILDERNESS STUDY AREA LOCATION MAP



WILDERNESS STUDY AREAS

4-1A	NEEDLE'S EYE
4-8	BLACK ROCK
4-14	FISHHOOKS
4-16	DAYMINE
4-22/23/24(A)	GILA BOX
4-22/23/24(B)	TURTLE MTN.
4-48	JAVELINA PEAK
4-60	PELONCILLO MTNS.
4-65	DOS CABEZAS MTNS.

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BUREAU OF LAND MANAGEMENT
ARIZONA STATE OFFICE
3707 N. 7th Street
P.O. Box 16563
Phoenix, Arizona 85011

IN REPLY REFER TO:
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April 1987

This is the Final Environmental Impact Statement (FEIS) for wilderness in the Bureau of Land Management's Safford District in southeastern Arizona and southwestern New Mexico. Nine wilderness study areas (WSA), totalling 135,664 acres, have been studied to determine their suitability for wilderness.

This FEIS satisfies the requirement of the Federal Land Policy and Management Act that directs the Secretary of the Interior to study public lands with wilderness characteristics for possible inclusion into the National Wilderness Preservation System. Since 1978, BLM has been studying the public lands and asking for comments from land users. This document presents my recommendations for nine WSAs in the Safford District.

This is not, however, a decision document. When mineral surveys are completed by the Bureau of Mines and U.S. Geological Survey, this FEIS and the mineral reports will be forwarded to the BLM Director and the Secretary of the Interior for their review. The Secretary must make his recommendations to the President by 1991. The President will, in turn, forward his recommendations to Congress. Only Congress can designate wilderness.

On behalf of the BLM, I want to thank you for the time and effort you took to participate in this study. Bureau specialists and managers have carefully read and listened to all of the comments and, in some cases, have modified our recommendations. Once again, thanks for your participation.

Sincerely,

D. Dean Bibles
State Director

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FINAL ENVIRONMENTAL IMPACT STATEMENT

PROPOSED WILDERNESS PROGRAM
FOR THE
SAFFORD DISTRICT WILDERNESS EIS AREA

Cochise, Gila, Graham and Greenlee Counties, Arizona
and
Hidalgo County, New Mexico

Prepared by

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
SAFFORD DISTRICT, ARIZONA

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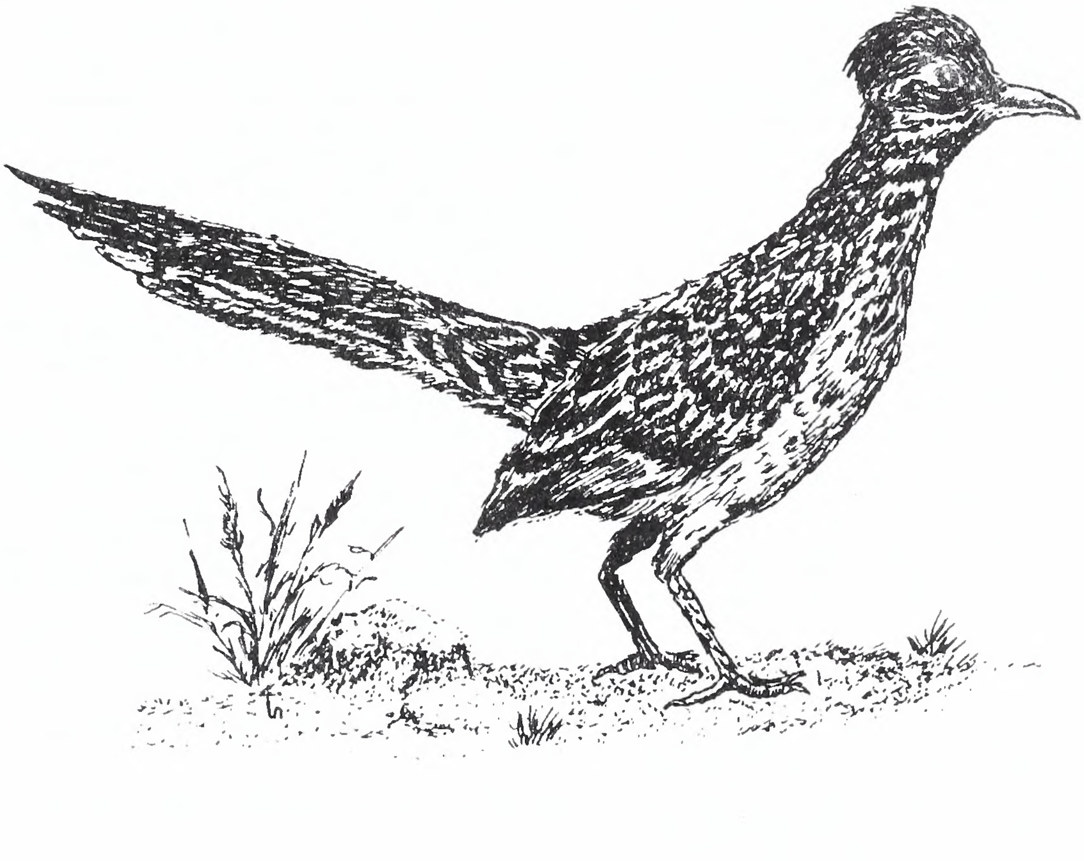
SUMMARY



SUMMARY

PURPOSE AND NEED

The BLM is under congressional mandate to review the public lands for roadless areas of 5,000 acres or more that have wilderness character, and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. This environmental impact statement (EIS) assesses the environmental consequences of managing as wilderness the nine wilderness study areas (WSA) in BLM's Safford District. The district lies in southeastern Arizona, in Cochise, Gila, Graham and Greenlee Counties, and southwestern New Mexico in Hidalgo County. The district includes the Gila and San Simon Resource Areas.

To avoid confusion with other public lands known as Happy Camp Canyon, the name of Happy Camp Canyon WSA has been changed to Dos Cabezas Mountains WSA.

The Safford District wilderness review includes the following steps:

- an *inventory phase* in which roadless areas were evaluated for size, naturalness and outstanding opportunities for solitude or primitive recreation;
- *a study phase* in which WSAs suitable for wilderness designation were determined; and
- *a reporting phase* in which suitability recommendations are forwarded to Congress through the Secretary of the Interior and the President.

To help identify and summarize significant issues related to wilderness management, BLM held a series of meetings to identify public concerns. BLM also evaluated public comments received during the inventory phase and comment period on the draft EIS and BLM specialists applied their professional judgement in analyzing issues. The issue identification process identified the following significant issues.

1. Would the WSA add to the diversity of the National Wilderness Preservation System?

2. How have existing activities of man impacted the natural values, opportunities for solitude and opportunities for primitive recreation in each WSA?

3. How would activities projected to occur in the next 10 years impact the natural values, opportunities for solitude and opportunities for primitive recreation in each WSA?

4. What impact would wilderness designation or nondesignation in the Gila Box WSA have on the construction of a flood control dam?

5. What impact would wilderness designation or nondesignation have on

- local, state and regional social and economic conditions?
- exploration and development of mineral and energy resources?
- implementation of allotment management plans, particularly livestock numbers, construction and maintenance of livestock facilities and rangeland condition and trend?
- wildlife populations, including threatened and endangered species?
- construction and maintenance of wildlife habitat improvement projects, particularly riparian habitat projects?
- motorized and primitive forms of recreation in each WSA?
- vegetation, including the protection of threatened and endangered species?
- cultural resources?
- paleontological resources?
- visual resources (scenic quality)?
- air quality?
- water quality and quantity?
- the continued use of the powerline and dam and reservoir site withdrawals in Needle's Eye WSA?
- the two segments of the Gila River (in Needle's Eye and Gila Box WSAs) that are eligible for study as possible components of the National Wild and Scenic River System?
- aircraft overflight in each WSA, particularly Air Force training flights?
- access across WSAs to state and private inholdings and state mineral estate (subsurface)?
- landowners adjacent to Black Rock WSA?

Issue No. 4, the impact of wilderness management on construction of a flood control dam, was left unresolved. This issue was not analyzed because no dam is expected to be built in the Gila Box WSA. The Camelsback site is not being considered by the Bureau of Reclamation for water storage purposes and while the the Corps of Engineers is considering it is a possible flood control site, it is not their preferred alternative. Ultimately Congress will review this wilderness study and the flood control/water supply study and make the decision concerning wilderness designation or a dam.

Because existing planning documents (BLM 1973a, 1973b, 1975 and 1981c) do not analyze the wilderness resource, BLM amended the documents, in 1982, through the preparation of a management situation analysis (MSA). In the MSA BLM discussed the physical, social and economic setting, existing resource management and effects of wilderness management on all other resources and uses in each WSA. From the MSAs, BLM developed a set of wilderness management alternatives for each WSA.

ALTERNATIVES

BLM analyzed a full range of alternatives for wilderness management of the EIS area's nine WSAs (see Table 2-1 for the WSAs included in each alternative). BLM selected five alternatives after analyzing public comments, identifying resource conflicts in MSAs for each WSA and applying the wilderness criteria.

***The Proposed Action** (Preferred Alternative)* would designate as wilderness parts of four WSAs (38,672 public land acres), enclosing no private or state land. Parts of four WSAs and all of five WSAs (96,992 public land acres) would not be designated wilderness.

All Wilderness would designate all nine WSAs (135,664 public land acres), preserving wilderness values but restricting other resource uses that might conflict with wilderness management. *All Wilderness* would enclose 663 acres of private land and 640 acres of state land. This alternative also includes 2,410 acres with non-federal minerals.

Enhanced Wilderness would designate as wilderness all or parts of nine WSAs (101,291 public land acres) and enclose 120 acres of private land and 640 acres of state land. Parts of seven WSAs (34,373 public land acres) would not be designated wilderness. This alternative also includes 995 acres with non-federal minerals.

Moderate Wilderness would designate as wilderness parts of five WSAs (48,864 public land acres), further adjusting boundaries from those under *Enhanced Wilderness. Moderate Wilderness* would enclose no state or private land. Parts of five WSAs and all of four WSAs (86,800 public land acres) would not be designated wilderness.

No Wilderness (No Action) would designate none of the nine WSAs as wilderness and would not restrict other resource uses. WSA management would be guided by the existing land use plans and BLM's Interim Management Policy until Congress releases these areas from wilderness study.

ENVIRONMENTAL CONSEQUENCES

BLM's interdisciplinary team of resource specialists determined that no alternative would significantly impact topography, soil, climate or fire management. Table 2-3 summarizes the impacts of each alternative by WSA. More detailed discussions of the environmental consequences may be found in Chapter 4.

Proposed Action (Preferred Alternative)

The *Proposed Action* would have no significant impact on water quality and supply or air quality. Noise produced by aircraft overflights or the Phelps Dodge mine would temporarily impact solitude in all WSAs except Black Rock. However, aircraft overflights of wilderness are not prohibited. Noise created by ORVs driving in the Gila and San Francisco River canyons during periods of low water would disrupt the solitude hikers and birdwatchers desire.

The *Proposed Action* would preserve the wilderness values and special features of parts of Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs, totalling 38,672 acres. Wilderness management under this alternative would not constrain anticipated mineral development in Black Rock and Dos Cabezas Mountains WSAs. No adverse impacts are anticipated to grazing systems or cattle numbers. Range condition would be maintained or improved in all WSAs.

ORV use would be prohibited in the recommended parts of Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs. Primitive recreation activities would be enhanced while recreation dependent on vehicular access would be adversely impacted. Wild and scenic river values on the Gila River in Needle's Eye WSA would be preserved through wilderness management. River values on the Gila in Gila Box WSA, though not preserved by wilderness management, would not be significantly impacted. Wildlife, including T&E species, and their habitat would generally benefit from wilderness management in Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs. Habitat improvement projects would be implemented and maintained, improving habitat condition. Poor riparian vegetation condition would improve on the Gila and San Francisco Rivers.

The *Proposed Action* would provide an additional measure of protection to candidate threatened and endangered plant species in Needle's Eye WSA. It would also help preserve 41 prehistoric sites and one historic site in the four WSAs proposed for wilderness. The fossils in Needle's Eye WSA would be protected and visual resource Class I management would preserve the scenery in Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs. There would be no significant adverse impacts to the local or regional economy, population or public attitudes and perceptions about BLM or wilderness.

All Wilderness

All Wilderness would result in no significant impact to water quality, and supply or air quality. There would be no significant impact to wilderness values caused by noise of military overflights or the mine and smelter adjacent to Gila Box and Turtle Mountain WSAs. Noise produced by ORVs would not impact backpackers' or birdwatchers' desire for solitude because the WSAs would be closed to ORV use. *All Wilderness* would designate all nine WSAs, preserving wilderness values and special features of 135,664 acres. Under this alternative, no significant adverse impacts to mineral or energy development would occur. Two grazing allotments in Turtle Mountain WSA would be reduced 213 and 447 AUMs. Range condition would improve or be maintained in the remaining WSAs. ORV use would be prohibited on vehicle ways in all WSAs, in the Gila and San Francisco River canyons in Gila Box WSA and on the dunes in Javelina Peak WSA. Recreation would shift to nonmotorized activities, enhancing opportunities for this type of recreation. Forty miles of vehicle ways would be closed to ORV use. *All Wilderness* would preserve the values that make the Gila River eligible for inclusion in the National Wild and Scenic River System.

Wilderness designation could adversely impact access to 640 acres of state inholdings and 663 acres of private inholdings in the Gila Box, Turtle Mountain, Javelina Peak and Dos Cabezas Mountains WSAs. Adequate access must be provided to inholdings but it may not necessarily be by vehicle over a road. If vehicular access were allowed, wilderness values would be impacted. Wilderness designation would generally benefit wildlife, including T&E species, and their habitat. No wildlife habitat improvement projects would be constrained except for a spring development, exclosure fence and a study exclosure in Turtle Mountain WSA. *All Wilderness* would protect and preserve two candidate threatened and endangered plant species, 71 known prehistoric sites, 12 known historic sites, fossil remains in Javelina Peak and Needle's Eye WSAs and the scenic quality of all WSAs. No significant local or regional economic impacts are anticipated, however, most local and county residents would continue to oppose wilderness designation.

Enhanced Wilderness

Enhanced Wilderness would have the same impact on water quality and supply and air quality as *All Wilderness*. *Enhanced Wilderness* would preserve the wilderness values of all or parts of nine WSAs totalling 101,291 acres. This alternative would have no significant impact to mineral or energy development. Impacts to livestock grazing would be the same as under *All Wilderness* except that one allotment in Turtle Mountain WSA would be reduced by 447 AUMs. Recreational ORV use would be prohibited in all designated wilderness, including the Gila River in Gila Box WSA. Recreation dependent on vehicle access would decrease and opportunities for primitive recreation would be enhanced. *Enhanced Wilderness* would preserve values of the Gila River that make it eligible for inclusion into the National Wild and Scenic River System (NWSRS).

Wilderness designation could adversely impact access to 640 acres of state and 120 acres of private inholdings in Gila Box, Turtle Mountain, Javelina Peak and Dos Cabezas Mountains WSAs in the same way as described for *All Wilderness*. Impacts to wildlife, including T&E species, and habitat improvement projects would be the same as *All Wilderness*. Poor riparian habitat condition would improve. Impacts to vegetation, including threatened or endangered plants, cultural resources and fossils would be the same as under *All Wilderness*.

All or parts of each WSA would be managed for visual resource management Class I objectives, preserving the scenery of the WSAs. Impacts to economic conditions and social elements would be the same as under *All Wilderness*.

Moderate Wilderness

Moderate Wilderness would have no significant impact on water quality or supply or air quality and would preserve the wilderness values of 48,864 acres in parts of Needle's Eye, Black Rock, Fishhooks, Gila Box and Dos Cabezas Mountains WSAs. Impacts to mineral and energy exploration would not be significant. This alternative would have no adverse impact on grazing systems or cattle numbers. Range condition would be maintained or improved in all WSAs. ORV use would be prohibited in each area recommended for wilderness but opportunities for primitive recreation would be preserved. *Moderate Wilderness* would preserve the river values that make the Gila River eligible for inclusion in the NWSRS. There would be no significant impact on access to inholdings as none exist under this alternative. Wilderness designation would generally benefit wildlife, including T&E species, and their habitat. Habitat improvement projects would not be constrained and wildlife would benefit. The condition of riparian vegetation would improve. Threatened and endangered plants would receive added protection from wilderness management in Needle's Eye WSA and fossil remains would also be preserved in the WSA. Wilderness designation would protect and preserve 51 prehistoric and two historic sites in Needle's Eye, Black Rock, Fishhooks, Gila Box and Dos Cabezas Mountains WSAs.

Visual resource Class I management would preserve the scenic quality in Needle's Eye, Black Rock, Fishhooks, Gila Box and Dos Cabezas Mountains WSAs. Impacts to economic conditions and social elements would not be significant.

No Wilderness (No Action)

No Wilderness (No Action) would have no adverse impact on water quality and supply or air quality in the WSAs. Air quality would continue to be managed as Class II. Noise from ORVs, aircraft overflights and the mine adjacent to Gila Box and Turtle Mountain WSAs would impact the solitude primitive recreationists desire. *No Wilderness (No Action)* would not designate any of the WSAs as wilderness. Wilderness values in parts of Needle's Eye, Black Rock, Turtle Mountain and Dos Cabezas Mountains would be impaired by ranch road construction, implementation of grazing systems and mineral development. *No Wilderness (No Action)* would not affect livestock grazing systems or cattle numbers. Ranch road construction could occur in Needle's Eye WSA. Under this alternative, ORV use would not be impacted. The additional ranch road would provide further opportunity for motorized access for recreation, adversely affecting opportunities for solitude and primitive recreation. Even though there would be no wilderness designations, wild and scenic river values on the Gila River would not be significantly impacted.

Access to inholdings would not be constrained by wilderness management. However, new access would be managed to prevent significant adverse environmental impacts. Road construction for access could result in adverse impacts to soils, vegetation, wildlife, scenery and wilderness values. Wildlife, including T&E species, and their habitat would not benefit from the protection of wilderness management, but habitat improvement projects would be implemented unaffected by wilderness management. The poor condition of riparian habitat on the Gila and San Francisco Rivers would improve.

No Wilderness (No Action) would not provide additional protection to threatened and endangered plants, cultural resources, fossil remains or existing scenery. However, these resources are not expected to be significantly impacted because public law and BLM regulations and policy would prevent significant degradation of the values.

Nondesignation would not adversely affect the local or regional economies. Local and county residents would be pleased with nondesignation, but attitudes and perceptions toward wilderness would not change significantly.

MITIGATING MEASURES

BLM's *Wilderness Management Policy* provides direction to mitigate the impacts of wilderness designation on the following activities: access to state or private inholdings, valid mining claims and the existing private rights that accompany such claims and the maintenance of existing livestock facilities. Many of these potential conflicts have been resolved through the wilderness study and environmental assessment processes, but some conflicts would remain. Specific management actions dealing with these conflicts will be addressed in wilderness management plans developed for each designated wilderness area.

Specific laws and regulations require BLM to protect threatened and endangered plants and animals, and cultural and visual resources. BLM is also required to manage the public lands to prevent unnecessary resource degradation. In the event of nondesignation, BLM has a variety of management tools available to preserve wilderness and other resource values.

ABBREVIATIONS

The following abbreviations are used in this EIS. Most of the terms are defined in the glossary.

ACEC	area of critical environmental concern
ADMR	Arizona Department of Mineral Resources
AG&FD	Arizona Game and Fish Department
AMP	allotment management plan
AUM	animal unit month
BLM	Bureau of Land Management
EA	environmental assessment
EIS	environmental impact statement
FS	Forest Service
FWS	Fish and Wildlife Service
HMP	habitat management plan
IMP	Interim Management Policy
kv	kilovolt
MFP	management framework plan
MSA	management situation analysis
NPS	National Park Service
NRQ	National Register Quality
NWPS	National Wilderness Preservation System
NWSRS	National Wild and Scenic River System
ONA	outstanding natural area
ORV	off-road vehicle
PNV	potential natural vegetation
USGS	U.S. Geological Survey
VRM	visual resource management
WSA	wilderness study area

Chapter 1

PURPOSE AND NEED

CHAPTER 1

PURPOSE AND NEED

INTRODUCTION

This environmental impact statement (EIS) has been prepared to determine the impacts that would occur to the resources and uses of nine wilderness study areas (WSAs) in the Safford District of the Bureau of Land Management (BLM). The impacts have been evaluated for each of five wilderness management alternatives ranging from all wilderness to no wilderness.

In June 1983, a draft EIS was released for public review. In that document, BLM proposed parts of four WSAs, totalling 38,595 acres, for wilderness designation. This document is a rewrite of the draft EIS incorporating public comment. In addition to responding to public input, BLM has provided a more detailed discussion of the description of the alternatives (Chapter 2), more information about the existing resources and uses (Chapter 3) and a more detailed analysis of the environmental impacts that would occur under each alternative (Chapter 4).

PURPOSE AND NEED

The BLM is under congressional mandate to provide for orderly use and development of the public lands and to preserve the land and its resources from destruction or unnecessary injury. The *Federal Land Policy and Management Act of 1976* (FLPMA) directs BLM to periodically inventory the public lands, to identify present uses and to plan for future uses in land use plans. These plans, management framework plans (MFPs), ensure that public lands are managed on a multiple-use and sustained yield basis and that the quality of natural resources is preserved.

Section 603 of FLPMA directs the Secretary of the Interior to review roadless areas of 5,000 acres or more with wilderness characteristics and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. Within two years after receiving a recommendation, the President must send his recommendation to Congress. Congress, however, has no time limit for acting on the President's recommendation. If Congress decides that some or all of the WSAs are to be designated as wilderness, BLM will amend the Safford District's MFPs to manage those areas as wilderness.

SETTING

The nine WSAs included in this environmental impact statement (EIS) are in the Gila and San Simon Resource Areas of the Safford District in Cochise, Gila, Graham and Greenlee Counties, Arizona and Hidalgo County, New Mexico (see location map inside front cover). The WSAs are Needle's Eye (AZ-040-1A), Black Rock (AZ-040-8), Fishhooks (AZ-040-14), Day Mine (AZ-040-16), Gila Box (AZ-040-22/23/24(A)), Turtle Mountain (AZ-040-22/23/24(B)), Javelina Peak (AZ-040-48), Peloncillo Mountains (AZ-040-60) and Dos Cabezas Mountains (AZ-040-65). To avoid confusion with other public lands known as Happy Camp Canyon, the name of the Happy Camp Canyon WSA has been changed to Dos Cabezas Mountains WSA.

Safford/Thatcher, Globe/Miami and Clifton/Morenci, Arizona are the largest communities near the WSAs. Duncan, Hayden/Winkelman and Willcox, Arizona, and Lordsburg, New Mexico are smaller centers of population. Phoenix and Tucson, Arizona and El Paso, Texas are large metropolitan areas within 5-hour drives of the EIS area.

WILDERNESS REVIEW PROCESS

To accomplish the mandate of *Section 603* of FLPMA, BLM developed a framework for the wilderness review process. This framework includes three phases: inventory, study and reporting.

The inventory phase began with the identification of all roadless areas. These areas were then evaluated for size, naturalness and outstanding opportunities for solitude or primitive types of recreation. Areas clearly lacking these required characteristics were eliminated early in the process. The remaining roadless areas were then further evaluated for their wilderness qualities. The inventory concluded with the identification of WSAs.

The purpose of the study phase was to determine those WSAs suitable for wilderness designation. These determinations, made through BLM's land use planning system, considered all resources and uses of the public lands. BLM specialists compared management of each WSA as wilderness with the management of other resources to determine the most appropriate use of the WSAs. The study phase concluded with the completion of this EIS.

The reporting phase consists of forwarding or reporting these suitability recommendations to Congress through the Secretary of the Interior and the President. Mineral surveys, draft and final EISs, public hearing records and a wilderness study report will accompany the recommendations.

WILDERNESS STUDY (PLANNING) PROCESS

The wilderness study (planning) process includes a number of different steps. The major steps are scoping (issue identification), the management situation analysis (application of criteria), selection of alternatives and preparation of an environmental impact statement.

Scoping (Issue Identification)

Scoping is the process for determining significant issues to be analyzed in an EIS. Scoping also eliminates from detailed study insignificant issues or issues addressed in earlier environmental reviews.

Results of Scoping

In preparing this EIS, the interdisciplinary team and resource managers considered the major areas of public interest and concern identified through scoping. The team used the scoping process to determine which concerns would be analyzed in this EIS. The scoping process identified the following significant issues:

1. Would a WSA add to the diversity of the National Wilderness Preservation System?

2. How have existing activities of man impacted the natural values, opportunities for solitude and opportunities for primitive recreation in each WSA?

3. How would activities projected to occur in the next 10 years impact the natural values, opportunities for solitude and opportunities for primitive recreation in each WSA?

4. What impact would wilderness designation or nondesignation in the Gila Box WSA have on the construction of a flood control dam?

5. What impact would wilderness designation or nondesignation have on

   - local, state and regional social and economic conditions?
   - exploration and development of mineral and energy resources?
   - implementation of allotment management plans, particularly livestock numbers, construction and maintenance of livestock facilities and rangeland condition and trend?
   - wildlife populations, including threatened and endangered species?
   - construction and maintenance of wildlife habitat improvement projects, particularly riparian habitat projects?
   - motorized and primitive forms of recreation in each WSA?
   - vegetation, including the protection of threatened and endangered species?
   - cultural resources?
   - paleontological resources?
   - visual resources (scenic quality)?
   - air quality?
   - water quality and quantity?
   - the continued use of the powerline and dam and reservoir site withdrawals in Needle's Eye WSA?
   - the two segments of the Gila River (in Needle's Eye and Gila Box WSAs) that are eligible for study as possible components of the National Wild and Scenic River System?
   - aircraft overflight in each WSA, particularly Air Force training flights?
   - access across WSAs to state and private inholdings and state mineral estate (subsurface)?
   - landowners adjacent to Black Rock WSA?

Issue No. 4, the impact of wilderness management on construction of a flood control dam was left unresolved. This issue was not analyzed because no dam is expected to be built in the Gila Box WSA. The Camelsback site is not being considered by the Bureau of Reclamation for water storage purposes and while the Corps of Engineers is considering it as a possible flood control site, it is not their preferred alternative. Ultimately Congress will review this wilderness study and the flood control/water supply study and make the decision concerning wilderness designation or a dam.

Management Situation Analyses (Application of Criteria)

Because the Safford District's management framework plans (MFPs) (BLM 1973a, 1973b, 1975 and 1981c) do not include the wilderness resource, BLM prepared a management situation analysis (MSA) for each WSA. These MSAs describe the physical, social and economic setting, discuss existing resource management and evaluate the effects of a wilderness designation on all other resources and uses in each WSA. From the MSAs, BLM developed a set of wilderness management alternatives for each WSA. The completed MSAs will be the amending documents that incorporate the wilderness resource into the MFPs.

The *Wilderness Study Policy* directs BLM to apply the following criteria and quality standards to each WSA. They were used to determine whether an area is suitable for wilderness or for other uses.

CRITERION NO. 1 — EVALUATION OF WILDERNESS VALUES

a. *Mandatory Wilderness Characteristics*: Size, naturalness and outstanding opportunities for solitude or primitive recreation.

b. *Special Features*: Ecologic, geologic and other features of scientific, educational, scenic or historic value.

c. *Multiple Resource Benefits*: Benefits to other resources and uses that only wilderness designation can ensure.

d. *Diversity in the National Wilderness Preservation System (NWPS)*:

(1) Expanding the diversity of natural systems. The Bailey-Kuchler system (Kucher and Bailey 1978) was used to display potential natural vegetation diversity in the NWPS and the WSAs.

(2) Assessing the opportunities for solitude or primitive recreation within 5 hours driving time of major population centers.

(3) Balancing the geographic distribution of wilderness areas.

CRITERION NO. 2 — MANAGEABILITY

The area must be capable of being effectively managed to preserve its wilderness character. From knowledge of the resources and their uses in the area, BLM must be reasonably certain that the area can be managed as wilderness over the long run.

Standard No. 1 — Energy and Mineral Resources

The impact of wilderness designation on the exploration and development of energy and mineral resources in the WSAs.

Standard No. 2 — Impacts on Other Resources

The extent to which other resources or uses of the WSA would be forgone or adversely affected by wilderness designation.

Standard No. 3 — Impacts of Nondesignation on Wilderness Values

The extent to which wilderness values of the WSA or a part of the WSA would be forgone or adversely affected by nondesignation.

Standard No. 4 — Public Comments

The comments received from interested and affected groups and individuals at the local, state, regional and national levels.

Standard 5 — Local Social and Economic Effects

The adverse or beneficial social and economic impacts of wilderness designation.

Standard No. 6 — Consistency with Other Plans

The extent to which a wilderness designation conforms with officially approved and adopted resource-related plans of state and local governments and Indian tribes.

Alternatives Developed

In response to known issues and resource conflicts, BLM began developing alternatives for each WSA early in the preparation of the MSAs. As the MSAs were completed, BLM developed other alternatives dealing with other resource conflicts, maintenance of wilderness values, more definable boundaries and the quality of the wilderness resource. In June 1982, these alternatives were presented to the public for comment. These public comments, further identification of resource conflicts and the application of wilderness criteria resulted in minor boundary changes under some of the alternatives.

The alternatives developed for each WSA were combined into an array of five alternatives to be addressed in this EIS:

1. ***Proposed Action*** — four WSAs — 38,672 acres of public land.
2. ***All Wilderness*** — nine WSAs — 135,664 acres of public land.
3. ***Enhanced Wilderness*** — nine WSAs — 101,291 acres of public land.
4. ***Moderate Wilderness*** — five WSAs — 48,864 acres of public land.
5. ***No Wilderness (No Action)*** — No wilderness areas recommended.

These alternatives provide BLM managers a wide range of options from which they can develop wilderness recommendations. They are based on the wilderness management recommendations developed for each WSA during the planning process. The *No Wilderness* and *All Wilderness* alternatives are required by the BLM Wilderness Study Policy (BLM 1982c). The partial wilderness alternatives are just three of many possible alternatives that could have developed. These alternatives, however, provide a full range of options as required by the *National Environmental Policy Act* (NEPA) and also address the issues raised by the public.

Environmental Impact Statement

The purpose of this EIS is to determine what the impacts will be to other resources if an area were to be designated wilderness, or partially designated, and what the impacts would be to the wilderness values and significant resources if the area were not designated as wilderness. WSAs designated as wilderness will be managed in accordance with the *Wilderness Management Policy* (See *Appendix No. 2*).

During the preparation of this EIS, an interdisciplinary team of resource specialists analyzed the environmental consequences of the recommendations for wilderness and compared them to the environmental consequences of reasonable alternatives. This EIS documents the analysis and comparisons.

The development of this EIS was guided by the *National Environmental Policy Act* and implementing regulations (40 CFR 1500), the BLM planning regulations *(43 CFR 1600)* and BLM's *Wilderness Study Policy*.

MANAGEMENT

Until Congress either designates these WSAs as wilderness or releases them from wilderness study, BLM will manage them under the *Interim Management Policy* (IMP) and *Guidelines for Lands Under Wilderness Review* (BLM 1979a) and the *Federal Land Policy and Management Act* (FLMPA). The IMP guides BLM in managing lands under wilderness review in compliance with *Section 603*(c) of FLPMA, which states:

> During the period of review of such areas and until Congress has determined otherwise, the Secretary shall continue to manage such lands according to his authority under this Act and other applicable law in a manner so as not to impair the suitability of such areas for preservation as wilderness, subject, however, to the continuation of existing mining and grazing uses and mineral leasing in the manner and degree in which the same was being conducted on the date of approval of this Act: Provided, That, in managing the public lands the Secretary shall by regulation or otherwise take any action required to prevent unnecessary or undue degradation of the lands and their resources or to afford environmental protection. Unless previously withdrawn from appropriation under the mining laws, such lands shall continue to be subject to such appropriation during the period of review unless withdrawn by the Secretary under the procedures of section 204 of this Act for reasons other than preservation of their wilderness character. Once an area has been designated for preservation as wilderness, the provisions of the Wilderness Act which apply to national forest wilderness areas shall apply with respect to the administration and use of such designated area, including mineral surveys required by section 4(d)(2) of the Wilderness Act, and mineral development, access, exchange of lands, and ingress and egress for mining claimants and occupants.

If a WSA is designated by Congress, it will be managed under the *Wilderness Act*, FLPMA, BLM's *Wilderness Management Policy* (see Appendix No. 2) and any requirements of the law designating the wilderness area. These laws and policies direct BLM to preserve the wilderness character of the area. In dealing with use in wilderness areas, the *Wilderness Act* states that such areas will be devoted to the public purposes of recreation, scenic, scientific, educational, conservation and historical use. The *Wilderness Act* also sets the following limits on use:

> Except as specifically provided for in this Act and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no landing of transport, and no structures or installation within any such area.

The following are other management policies that apply to designated wilderness areas:

- Guide services could be allowed within wilderness areas to serve recreation or other wilderness purposes.
- The Wilderness Act does not affect state water laws or the state responsibilities for wildlife.
- Access to state or privately owned inholdings within wilderness areas will be guaranteed.
- If in the public interest, the President may authorize establishing and maintaining reservoirs, power projects, transmission lines, roads and other such facilities in wilderness areas.
- The maintenance of supporting facilities, existing in an area prior to its classification as wilderness (including fences, line cabins, water wells and lines, stock tanks, etc.), is permissible in wilderness. Where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment.
- New projects (not requiring a new road for access) such as wildlife water developments, stock ponds, spring developments, pipelines and fences could be allowed after a review of their impacts through an environmental assessment.
- Mining and mineral leasing would be prohibited in wilderness areas after designation, except on valid existing claims and leases and for non-impairing prospecting.
- Prescribed burning may be allowed on a case-by-case basis. Such cases may include perpetuation of threatened and endangered species, reintroduction or maintenance of a natural condition of a fire dependent ecosystem, restoration of fire where fire control has interfered with natural ecological processes and perpetuation of wilderness values dependent on fire.

Chapter 2

ALTERNATIVES

CHAPTER 2

ALTERNATIVES INCLUDING THE PROPOSED ACTION

INTRODUCTION

This EIS analyzes five alternatives, including the *Proposed Action*. Chapter 2 describes each of these alternatives, describes each WSA by alternative and discusses how the WSAs will be managed under each alternative. The maps in the back of this EIS may be folded out and used while reading these descriptions.

Table 2-1 shows the acres that would be designated wilderness and the inholdings under each alternative. Some of the acres listed in Table 2-1 may differ from acres shown in the draft EIS because of an expansion of the *Proposed Action* to include additional acres in Fishhooks and Dos Cabezas Mountains (formerly known as Happy Camp Canyon) WSAs and the expansion of six WSAs to include state lands acquired through exchange.

In 1985, BLM acquired state land within and/or adjacent to six WSAs —Needle's Eye, Black Rock, Fishhooks, Day Mine, Javelina Peak and Dos Cabezas Mountains WSAs. Table 2-2 shows the WSAs and acres acquired in each. It also shows whether the acquired land is surface and subsurface or only subsurface. The acquired land has been added to the original WSAs and is being analyzed in this EIS to determine its wilderness suitability.

To provide the public and decision-maker with a tool for comparing impacts and reaching conclusions, Chapter 2 ends with a summary of the impacts for each WSA under each alternative (see Table 2-3).

DESCRIPTION OF THE ALTERNATIVES

This section describes each of the five alternatives and includes information on private and state inholdings in four of the WSAs and non-federal minerals in two of the WSAs (see Table 2-1). Some of the inholdings and non-federal minerals would remain under the *All Wilderness* and *Enhanced Wilderness* alternatives.

Proposed Action

Theme

The ***Proposed Action*** would place primary emphasis on making public land and resources available for use and development, while also protecting the highest quality wilderness areas. In designated areas, the goal of this alternative is to change management direction so that management issues are resolved in a manner placing highest priority on preservation and improvement of wilderness values. In areas not designated, management emphasis would be placed on multiple uses other than wilderness.

Description

The ***Proposed Action*** would designate 38,672 acres as wilderness, including parts of Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs. The *Proposed Action* would enclose no state or private land. Parts of four WSAs and all of five WSAs, totaling 96,992 acres, would not be designated wilderness under this alternative.

All Wilderness

Theme

All Wilderness would place management emphasis on preserving and improving the wilderness values in all WSAs. Resource use and development would be permitted to the extent compatible with the wilderness protection emphasis. The goal of this alternative is to change present management direction so that management issues are resolved in a manner that places highest priority on the preservation and improvement of wilderness values.

Description

All Wilderness would designate all nine WSAs (135,664 acres)as wilderness, preserving wilderness values in all WSAs but restricting other resource uses that might conflict with wilderness management. *All Wilderness* would enclose 663 acres of private land and 640 acres of state land. This alternative would also include 2,410 acres with non-federal minerals in designated wilderness.

Enhanced Wilderness

Theme

Enhanced Wilderness would place primary emphasis on preserving and improving wilderness values, while removing major resource conflicts from the areas designated as wilderness. The goal of this alternative is to change present management direction so that the identified issues are resolved in a manner placing priority on the preservation and improvement of wilderness values, while allowing resource use and development outside the areas designated as wilderness.

Description

Enhanced Wilderness would designate 101,291 acres as wilderness, including all of Needle's Eye and Fishhooks WSA and portions of the other seven WSAs. Similar to *All Wilderness* but involving less area, *Enhanced Wilderness*

TABLE 2-1
WSA ACRES BY ALTERNATIVE

Bureau of Land Management
Safford District, Arizona

WSA	Public Acres		Inholdings		Non-Federal Minerals
	Designated	Nondesignated	Private	State	
		PROPOSED ACTION			
Needle's Eye	9,201	515	0	0	0
Black Rock	6,590	1,902	0	0	0
Fishhooks	10,883	4,332	0	0	0
Day Mine	0	17,309	0	0	0
Gila Box	0	17,831	0	0	0
Turtle Mountain	0	17,422	0	0	0
Javelina Peak	0	18,853	0	0	0
Peloncillo Mountains	0	12,317	0	0	0
Dos Cabezas Mountains	11,998	6,511	0	0	0
Total	38,672	96,992	0	0	0
		ALL WILDERNESS			
Needle's Eye	9,716	0	0	0	0
Black Rock	8,492	0	0	0	0
Fishhooks	15,215	0	0	0	0
Day Mine	17,309	0	0	0	0
Gila Box	17,831	0	80	0	0
Turtle Mountain	17,422	0	285	640	0
Javelina Peak	18,853	0	40	0	1,650
Peloncillo Mountains	12,317	0	0	0	760
Dos Cabezas Mountains	18,509	0	258	0	0
Total	135,664	0	663	640	2,410
		ENHANCED WILDERNESS			
Needle's Eye	9,716	0	0	0	0
Black Rock	7,614	878	0	0	0
Fishhooks	15,215	0	0	0	0
Day Mine	12,362	4,947	0	0	0
Gila Box	15,272	2,559	80	0	0
Turtle Mountain	9,104	8,318	0	640	0
Javelina Peak	7,035	11,818	0	0	195
Peloncillo Mountains	10,418	1,899	0	0	760
Dos Cabezas Mountains	14,555	3,954	40	0	0
Total	101,291	34,373	120	640	955
		MODERATE WILDERNESS			
Needle's Eye	9,201	515	0	0	0
Black Rock	6,590	1,902	0	0	0
Fishhooks	10,883	4,332	0	0	0
Day Mine	0	17,309	0	0	0
Gila Box	10,192	7,639	0	0	0
Turtle Mountain	0	17,422	0	0	0
Javelina Peak	0	18,853	0	0	0
Peloncillo Mountains	0	12,317	0	0	0
Dos Cabezas Mountains	11,998	6,511	0	0	0
Total	48,864	86,800	0	0	0
		NO WILDERNESS			
Needle's Eye	0	9,716	0	0	0
Black Rock	0	8,492	0	0	0
Fishhooks	0	15,215	0	0	0
Day Mine	0	17,309	0	0	0
Gila Box	0	17,831	0	0	0
Turtle Mountain	0	17,422	0	0	0
Javelina Peak	0	18,853	0	0	0
Peloncillo Mountains	0	12,317	0	0	0
Dos Cabezas Mountains	0	18,509	0	0	0
Total	0	135,664	0	0	0

Source: Safford District Files

TABLE 2-2
ACQUIRED STATE LAND

Bureau of Land Management
Safford District, Arizona

WSA	Location	Acres Acquired: Surface and Subsurface	Acres Acquired: Subsurface Only
Needle's Eye	—T. 3 S., R. 17 E., Sec. 16, Lots 1-4, S½S½	231	0
Black Rock	—T. 6 S., R. 21 E., Sec. 2, Lots 1-4, S½N½, S½	0	545
Fishhooks	—T. 3 S., R. 23 E., Sec. 2, Lots 3 and 4, S½NW¼, NW¼SW¼	202	0
Day Mine	—T. 3 S., R. 24 E., Sec. 32, All	640	0
	—T. 4 S., R. 24 E., Sec. 2, NW¼SW¼	40	0
Javelina Peak	—That portion of T. 9 S., R. 28 E., Sec. 36, SW¼NE¼ south of the powerline R/W and road	23	0
	—That portion of T. 9 S., R. 29 E., Sec. 30 south of the powerline R/W and road	275	0
	—T. 9 S., R. 29 E., Sec. 31, Lots 1-4, NE¼, E½NW¼, E½SW¼, SE¼	685	0
Dos Cabezas Mountains	—T. 13 S., R. 27 E., Sec. 25, Lots 1-4, W½NE¼, NW¼, SW¼, W½SE¼	591	0
	—T. 13 S., R. 27 E., Sec. 36, Lots 1-4, W½NE¼, NW¼, SW¼, W½SE¼	597	0
	—T. 14 S., R. 27 E., Sec. 2, NE¼, W½	0	496
	—T. 14 S., R. 28 E., Sec. 16, NE¼, W½, N½SE¼	560	0
	—T. 14 S., R. 28 E., Sec. 16, S½SE¼	0	80

Source: Safford District Files

would enclose 120 acres of private land, 640 acres of state land and 955 acres with non-federal minerals. Parts of seven WSAs, totaling 34,373 acres, would not be designated wilderness under this alternative.

Moderate Wilderness

Theme

Moderate Wilderness would balance competing demands by providing public lands and resources for use and development, while protecting higher quality wilderness areas. The goal of this alternative is to change present management to the extent necessary to resolve management issues in a manner that balances use and development of resources and preserves wilderness values.

Description

Moderate Wilderness would designate 48,864 acres as wilderness, including parts of Needle's Eye, Black Rock, Fishhooks, Gila Box and Dos Cabezas Mountains WSAs, further adjusting boundaries from those under *Enhanced Wilderness*. Wilderness areas under *Moderate Wilderness* would have no private or state inholdings. Parts of five WSAs and all of four WSAs, totaling 86,800 acres, would not be designated wilderness under this alternative.

No Wilderness (No Action)

Theme

No Wilderness (No Action) would place total emphasis on a continuation of resource management existing before the wilderness study and interim wilderness management. Management direction would emphasize multiple uses other than wilderness, as established through the Black Hills, Geronimo, San Simon and Winkelman Management Framework Plans (MFPs), and would be consistent with the multiple use and sustained yield concepts of FLPMA. The *No Wilderness (No Action)* alternative provides a basis for impact comparison between the current condition (*No Wilderness — No Action*) and projected condition (the *Proposed Action* and other alternatives projecting wilderness). This alternative identifies the anticipated impacts to the wilderness values of each WSA if not made wilderness.

Description

No Wilderness (No Action) would designate none of the nine WSAs as wilderness and would not restrict other resource uses. Management would be guided by the *Interim Management Policy* until Congress releases the WSAs from wilderness study. Resource management would then be directed by the current land use plans.

PREFERRED ALTERNATIVE

The *Proposed Action* is the *Preferred* alternative, and recommends parts of Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs, totaling 38,672 acres, as suitable for wilderness designation (see Table 2-1). The *Preferred* alternative is similar to the *Proposed Action* described in the draft EIS, differing primarily in Fishhooks and Dos Cabezas Mountains WSAs. The Fishhooks recommendation was expanded southward to include all of Dutch Pasture Canyon. The boundary follows a ridgeline south of the canyon. The Dos Cabezas Mountains recommendation was expanded eastward to the Sheep Canyon area east of Government Peak (see Maps 23 and 29).

The *Preferred* alternative was developed from written and oral comments received on the draft EIS during the public comment period.

WSA DESCRIPTION BY ALTERNATIVE

Since the pattern of future management activities cannot be predicted with certainty, assumptions must be made in order to conduct this impact analysis. The following management descriptions are the basis for the impact analysis in Chapter 4 and are believed to be reasonable projections of activities that would occur upon implementation of the *Proposed Action* or any of the alternatives.

A 10-year period for projection of activities was chosen because 10 years, in most instances, is the maximum length of time that BLM management and specialists felt they could predict events with much accuracy. Hereafter, even if not specifically stated, the 10-year period is the framework for expected activities.

NEEDLE'S EYE

AZ-040-1A (Map 21)

PROPOSED ACTION AND MODERATE WILDERNESS. These alternatives would designate 9,201 acres as wilderness but not designate 515 acres. Under these alternatives, the western boundary would follow ridgelines and the eastern boundary would follow a vehicle way (see Map 21).

Aircraft Overflights. The U.S. Air Force would conduct about 1,300 low-level (500-1500 feet above ground-level) military training flights per year over the WSA for the next 10 years. Flights typically include one or more aircraft and last one to two minutes. Projections beyond the 10-year period estimate about the same level of use over the WSA.

Minerals and Energy Operations. The wilderness would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation submitted to conduct mining in the wilderness would be examined to determine whether the mining claims were valid. No exploration or development of existing claims would occur in the next 10 years due to the absence of rock that supports mineralization. No oil and gas or geothermal exploration or development would occur in the next 10 years because the WSA is not considered valuable for these energy sources. There are no leases in the WSA.

Livestock Grazing Operations. Livestock use would increase 191 animal unit months (AUMs) in the next 10 years. The Mescal Mountain Allotment is currently understocked and cattle use in the WSA would increase from 1,086 to 1,277 AUMs (about 16 cows yearlong). Livestock use in the Christmas Allotment would not change from the current 85 AUMs in the WSA. Total use in the WSA would increase from 1,171 to 1,362 AUMs. Projections beyond the 10-year period estimate the same level of livestock use. Five and one-quarter miles of fence, a line cabin, three developed springs and two corrals would be maintained in the WSA throughout the 10-year period. Four miles of fence would be built along the Gila River to manage livestock between public lands and the San Carlos Indian Reservation. Beyond the 10-year period no additional livestock facilities would be built.

Recreation Use. The area designated wilderness would be closed to off-road vehicle (ORV) use, though existing use is very light (about 50 recreation visitor days — RVD — per year) and occurs mostly on the vehicle way that forms the eastern boundary of the wilderness. Existing recreation uses would continue throughout the WSA: fishing (150 RVDs annually); hunting (50 RVDs); and hiking/backpacking (50 RVDs). In the next 10 years slight increases in recreation use would occur, primarily in hiking and backpacking. Total use of all activities, however, would not exceed 500 RVDs annually. Projections beyond the next 10 years estimate additional small increases in use, not to exceed 1,000 RVDs. No recreation facilities exist and none would be built in the WSA in the next 10 years.

Land Uses. The 44 kv powerline that crosses the WSA would be surveyed every 90 days, by helicopter, to determine maintenance needs. The survey flights last about 30 minutes. Should maintenance be necessary, access would be by foot, horseback and/or helicopter.

Materials would be flown in. Within the next 10 years the powerline would be upgraded to 69 kv capacity. This would necessitate a change of the powerlines but not the towers. Access would be by foot, horseback and/or helicopter and no road construction would occur. Beyond the 10-year period no changes to the powerline would occur.

There would be three hydroelectric dam and reservoir site withdrawals in the WSA on the Gila River, but no dam construction in or beyond the 10-year period.

Wildlife Habitat Projects. To improve riparian habitat and vegetation for wildlife in the WSA, two exclosures would be built and cottonwood trees planted on the Gila River. Within the next 10 years, additional sites would be fenced and planted after the current sites are established and the trees are free from damage by wildlife and cattle. The existing livestock exclosures on Mescal Creek would be maintained and, within the next 10 years, additional sites would be fenced and planted with cottonwoods to reestablish riparian vegetation. This program would continue on both Mescal Creek and the Gila River beyond the 10-year period.

To extend the range of native fish populations in the Gila River drainage, Gila topminnow have been introduced into existing ponds at Mescal Warm Springs and desert pupfish, loach minnow, spikedace and Gila chub would be introduced into Mescal Creek and adjoining springs. These introductions would be maintained but no others would occur beyond the 10-year period.

ALL WILDERNESS AND ENHANCED WILDERNESS. These alternatives would designate all 9,716 acres of Needle's Eye WSA as wilderness (see Map 21). The management actions anticipated under these alternatives would be the same as those described for the *Proposed Action* and *Moderate Wilderness*, except for Recreation Use.

Recreation Use. The entire WSA would be closed to ORV use, eliminating the use on the vehicle way in the eastern part of the WSA. This closure would eliminate about 50 RVDs annually. Other recreation uses would continue as described for the *Proposed Action* and *Moderate Wilderness.*

NO WILDERNESS (NO ACTION). This alternative would not designate any of Needle's Eye WSA as wilderness (see Map 21). The management actions anticipated under this alternative would be the same as those described for the *Proposed Action* and *Moderate Wilderness*, except for Livestock Grazing Operations and Recreation Use.

Livestock Grazing Operations. Livestock grazing operations under this alternative would be the same as described for the *Proposed Action* and *Moderate Wilderness*, except for an additional livestock management facility to be constructed. To facilitate livestock gathering and shipping operations, two and one-half miles of road would be built from the vehicle way in the eastern part of the WSA to Dick Spring in Section 23 and a corral built at the end of the road.

Recreation Use. Recreation uses under this alternative would be the same as described for the *Proposed Action* and *Moderate Wilderness* except the entire WSA would remain open to ORV use (about 50 RVDs annually). Most use would be confined to existing roads and trails due to the extremely rugged topography.

BLACK ROCK

AZ-040-8 (Map 22)

PROPOSED ACTION AND MODERATE WILDERNESS. These alternatives would designate 6,590 acres of Black Rock WSA as wilderness but not designate 1,902 acres. The eastern boundary of the wilderness would follow ridgelines running north and south from Jackson Mountain (see Map 22), tying into the existing Santa Teresa (Forest Service) Wilderness boundary.

Aircraft Overflights. The U.S. Air Force would conduct about 450 military training flights per year over the WSA for the next 10 years and beyond. Flights would be at 5,000 feet above ground level and last one to two minutes. One or more aircraft would be involved in each flight.

Minerals and Energy Operations. The wilderness would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operations submitted to conduct mining in existing rights in the wilderness would be examined to determine the validity of the mining claims. Further exploration and production is expected on the fluorspar claims north of Jackson Mountain in the area not designated wilderness. Based on past operations at this site, an estimated 10 acres of surface disturbance would be associated with continued exploration, development and production and nine acres of surface disturbance associated with road construction. One and one-half miles of road would be built from the existing cherrystemmed mining road in Sections 5 and 8 to the exploration site in the northwest quarter of Section 8. At the exploration site, one acre of surface disturbance would result from exploration and eventual development (trenches, waste piles, leveling, vegetation removal and loading areas). No oil and gas or geothermal leases exist in the WSA. No exploration or development would occur in the WSA over the next 10 years because the area is not considered valuable for these energy sources.

Livestock Grazing Operations. Livestock use in the WSA would be maintained at 877 animal unit months (AUM) for cattle for the next 10 years and beyond. Nine miles of fence, two miles of pipeline, six dirt dams, one rock and concrete dam and three developed springs would be maintained in the WSA throughout the 10-year period. One mile of fence, two slickrock catchments and storages and one-half mile of stock trail would be built, but only the fence would be in the area designated wilderness. Beyond the 10-year period, no additional livestock facilities would be built in the WSA.

Recreation Use. The area designated wilderness would be closed to off-road vehicle (ORV) use, eliminating about 50 recreation visitor days (RVDs) annually on the vehicle way in Four-mile Canyon. ORV use would continue on the cherrystem mining road in Sections 5 and 8. Other existing recreation use would continue in the WSA, including hiking and backpacking (150 RVDs annually) and hunting (75 RVDs). In the next 10 years, hunting, hiking and backpacking would increase but total recreation use would not exceed 1,000 RVDs. Projections beyond the 10-year period show small increases at about the same pace. A hiking trail originates in Section 10 in Black Rock Creek and crosses the WSA, heading south into the adjacent Santa Teresa (Forest Service) Wilderness. This trail would not be maintained, but closed and allowed to revegetate naturally. In an effort to minimize impacts to the private landowner, the trailhead would be relocated off the Fisher Basin Road in T. 6 S, R. 21 E., Section 4, and head south to tie back into the trail in Black Rock Creek in Section 9. Beyond the 10-year period no additional facilities would be constructed in the WSA.

Land Uses. The public would continue to use Black Rock Road to access the WSA, and people-related problems such as vandalism, littering and trespass would continue on adjacent private land and the San Carlos Indian Reservation. This problem would continue throughout the 10-year period and beyond.

Wildlife Habitat Projects. To improve habitat for wildlife, 15 small exclosure fences would be reconstructed around existing ash and cottonwood trees in Black Rock Creek. These fences would be temporary, remaining only until the trees had grown large enough to minimize the risk of damage by wildlife and cattle. Three larger (1- to 2-acre) exclosures would also be built to protect riparian habitat. No other wildlife projects would be implemented in the next 10 years.

ALL WILDERNESS.

All Wilderness would designate all 8,492 acres of Black Rock WSA as wilderness (see Map 22). The management actions anticipated under this alternative would be the same as those described for the *Proposed Action* and *Moderate Wilderness* except for Minerals and Energy Operations and Livestock Grazing Operations.

Minerals and Energy Operations. The fluorspar mining operation described for the *Proposed Action* and *Moderate Wilderness* would be the same under this alternative but the activity would occur in the area designated wilderness because a valid existing right would be established as of the date of wilderness designation.

Livestock Grazing Operations. The livestock management operations described under the *Proposed Action* and *Moderate Wilderness* would be the same under this alternative except that construction of the fence, slickrock catchments and storages and stock-trail would all occur in the area designated wilderness.

ENHANCED WILDERNESS. *Enhanced Wilderness* would designate 7,614 acres of Black Rock WSA as wilderness but not designate 878 acres (see Map 22). The wilderness boundary would follow ridgelines running north and east from the summit of Jackson Mountain. Under this alternative, the wilderness boundary excludes the area of mineral interest. The management actions anticipated under this alternative would be the same as described for the *Proposed Action* and *Moderate Wilderness*.

NO WILDERNESS (NO ACTION). This alternative would not designate any of Black Rock WSA as wilderness (see Map 22). The management actions anticipated under this alternative would be the same as those described for the *Proposed Action* and *Moderate Wilderness*, except for Recreation Use.

Recreation Use. The WSA would not be designated wilderness and ORV use would be allowed to continue. As a result, ORV use on the Fourmile Canyon vehicle way (about 50 RVDs annually) would continue. All other recreation uses would be the same as described for the *Proposed Action* and *Moderate Wilderness*.

FISHHOOKS

AZ-040-14 (Map 23)

PROPOSED ACTION AND MODERATE WILDERNESS. These alternatives would designate 10,883 acres of Fishhooks WSA as wilderness but not designate 4,332 acres. The southeastern boundary of the wilderness under these alternatives would follow the east-west ridgeline south of the Dutch Pasture Canyon (see Map 23). The wilderness boundary excludes an area with mining claims and several imprints of man.

Aircraft Overflights. The U.S. Air Force would conduct about 450 military training flights per year over the WSA, with flights from 500 to 1,500 feet above ground level and lasting from one to two minutes. One or more aircraft would be involved in each flight. Projections beyond the 10-year period show about the same number of flights over the WSA.

Minerals and Energy Operations. The wilderness would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation submitted to conduct mining in the wilderness would be examined to determine the validity of the mining claims. Exploration or development of existing claims would not occur during or beyond the next 10 years due to the low mineral production potential of the WSA. There are no oil and gas or geothermal leases in the WSA, and no exploration or development is expected in the next 10 years, or beyond, because the WSA is not considered valuable for either of these energy sources.

Livestock Grazing Operations. Livestock use would increase 53 animal unit months (AUM) in the next 10-year period. The Tom Springs Allotment is currently understocked and cattle use in the WSA would increase from 265 to 318 AUMs (about 4 cows yearlong). Livestock use in the Diamond Bar and Day Mine Allotments would not change from the current 926 and 120 AUMs, respectively, in the WSA. Total use in the WSA would increase from 1,311 to 1,364 AUMs. Eleven miles of fence, four dirt dams, one corral, two rock and concrete dams, two catchments and storages and one developed spring would be maintained in the WSA throughout the 10-year period. One mile of fence and three spring developments would be constructed in the wilderness under these alternatives in the next 10 years. Projections beyond the 10-year period for the WSA show the same level of livestock use and continued maintenance of existing facilities but no additional facility construction.

Recreation Use. The area designated wilderness would be closed to off-road vehicles (ORV), eliminating about 50 recreation visitor days (RVD) of use annually. The other existing use, hunting (about 50 RVDs annually), would continue. In the next 10 years, uses such as hiking and backpacking would increase in the wilderness but would not exceed 500 RVDs. Total use of all recreation activities would increase but not exceed 500 RVDs per year. Beyond the 10-year period, use would continue to increase in small annual increments but total use would not exceed 1,000 RVDs annually. No trails or facilities exist and none would be built in the next 10 years.

Wildlife Habitat Projects. In the next 10 years no habitat improvement projects would be constructed in the WSA. Five small (less than one acre), and one larger (four and one-half acres) livestock exclosures would be maintained. Beyond the 10-year period, no additional habitat improvement measures would be implemented.

ALL WILDERNESS AND ENHANCED WILDERNESS. These alternatives would designate all 15,215 acres of Fishhooks WSA as wilderness (see Map 23). The management actions anticipated under these alternatives would be the same as those described for the *Proposed Action* and *Moderate Wilderness*.

NO WILDERNESS (NO ACTION). This alternative would not designate any of Fishhooks WSA as wilderness (see Map 23). The management actions anticipated under this alternative would be the same as described under the *Proposed Action* and *Moderate Wilderness*, except for Recreation Use.

Recreation Use. The WSA would not be designated wilderness and ORV use would continue (about 50 RVDs annually). All other recreation uses would continue as described for the *Proposed Action* and *Moderate Wilderness*.

DAY MINE

AZ-040-16 (Map 24)

PROPOSED ACTION, MODERATE WILDERNESS AND NO WILDERNESS (NO ACTION). These alternatives would not designate any of Day Mine WSA as wilderness (see Map 24).

Aircraft Overflights. The U.S Air Force would conduct about 450 military training flights per year over the WSA for the next 10 years. Flights would occur from 500 to 1,500 feet above ground level and last from one to two minutes. One or more aircraft would be involved in each flight.

Minerals and Energy Operations. The WSA would be available for minerals and energy exploration and development but no such activities would take place under these alternatives in the next 10-year period or beyond. Even though some mineral potential exists and some lands in the WSA are considered to have geothermal resources, production potential for both minerals and energy is considered to be low due to the lack of occurrences in and near the WSA.

Livestock Grazing Operations. Livestock use would be maintained at 1,118 animal unit months (AUM) for the next 10 years and beyond. Seven miles of fence, two pipelines, four dirt dams, two developed springs and a small field weather station would be maintained throughout and beyond the 10-year period. Under these alternatives three slickrock catchments and storage tanks, one rock and concrete dam, one dirt dam, about one-half mile of stock-trail and one mile of fence would be constructed in the next 10 years. Beyond this period no additional facilities would be needed.

Recreation Use. Under these alternatives the primary uses in the WSA would be hunting (about 50 recreation visitor days — RVD — annually) and off-road vehicle (ORV) use (about 50 RVDs). In the next 10 years, total use for these two activities would increase to about 300 RVDs annually. Beyond the 10-year period, use would continue to increase in small increments but the total would not exceed 500 RVDs per year. No trails or recreation facilities exist in the WSA and none would be built in the next 10 years or beyond.

Wildlife Habitat Projects. In the next 10 years and beyond no habitat improvement projects would be constructed in the WSA; however five existing livestock exclosures (from one-quarter to two acres) would be maintained.

ALL WILDERNESS. This alternative would designate all 17,309 acres of Day Mine WSA as wilderness (see Map 24). The management actions anticipated under this alternative would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except for Minerals and Energy Operations and Recreation Use.

Minerals and Energy Operations. The wilderness would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation submitted to conduct mining in the wilderness would be examined to determine the validity of the mining claims. Even though some mineral potential exists and some lands in the wilderness are considered to have geothermal resources, production potential for both minerals and energy is considered to be low due to the lack of occurrences in and near the wilderness.

Recreation Use. Recreation use would be the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would be prohibited on the vehicle way beyond Brushy Tank and on the fenceline way in the northwest part of the wilderness. This would result in the elimination of about 50 RVDs annually. With wilderness designation, primitive recreation uses such as hiking and backpacking would increase in the next 10 years but would not exceed 500 RVDs per year. Beyond the 10-year period, there would be continued small increases in use (not to exceed 1,000 RVDs per year) for hunting, hiking and backpacking.

ENHANCED WILDERNESS. *Enhanced Wilderness* would designate 12,362 acres of Day Mine WSA as wilderness. The nondesignated area includes 4,947 acres on the WSA's northern, western and southern sides (see Map 24). The wilderness boundary would follow topographic features and exclude most of the cherrystem roads and vehicle ways and other imprints of man. The anticipated management activities under this alternative would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*, except for Minerals and Energy Operations and Recreation Use.

Minerals and Energy Operations. The wilderness would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to the existing rights. Any plans of operation submitted to conduct mining in the wilderness would be examined to determine the validity of the mining claims. Even though some mineral potential exists and some lands in the WSA are considered to have geothermal resources, production potential for both minerals and energy is considered to be low due to the lack of occurrences in and near the WSA. Projections beyond the 10-year period would not show any mineral or energy activities.

Recreation Use. Recreation use would be the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would be prohibited on the vehicle way beyond Brushy Tank, resulting in the elimination of about 25 RVDs annually. With wilderness designation, primitive recreation uses such as hiking and backpacking would increase in the next 10 years but would not exceed 300 RVDs per year. Projections beyond the 10-year period show continued small increases in use not to exceed 500 RVDs per year for hunting, hiking and backpacking.

GILA BOX

AZ-040-22/23/24(A) (Map 25)

PROPOSED ACTION AND NO WILDERNESS (NO ACTION). These alternatives would not designate any of the Gila Box WSA as wilderness (see Map 25).

Aircraft Overflights. The Air National Guard would conduct military training flights over the WSA for the next 10 years. The number of flights is not known but they would be from 1,500 to 51,000 feet above ground level and last from one to two minutes.

Minerals and Energy Operations. The WSA would be open for mineral and energy exploration and development but no such activities would take place under these alternatives in the next 10 years. Because the WSA lies between two large copper ore deposits, it is considered to have some mineral potential. It is unknown whether mineralized rock lies beneath the volcanic cover of the WSA, but if it does, it may be as much as 2,300 to 6,300 feet below the surface of the WSA. The land within the WSA is classified as prospectively valuable for geothermal resources. Within current technology, however, there would be no foreseeable economic uses of the geothermal energy. Projections beyond the 10-year period do not show any mining or energy exploration or production activities in the WSA.

Noises from the adjacent mine and smelter at Morenci would be heard in the WSA on occasion.

Livestock Grazing Operations. Livestock use in the WSA would be maintained at 1,917 animal unit months (AUM) for the next 10 years and beyond. Nine miles of fence, five developed springs, two pipelines (total two miles), three corrals, two dirt dams and three storage tanks would be maintained and during the next 10 years one-half mile of pipeline and one storage tank would be built. Projections beyond the 10-year period show continued maintenance of existing facilities but no further developments.

The Turtle Mountain Allotment is in both the Gila Box and Turtle Mountains WSAs. Designating wilderness in Turtle Mountain WSA would decrease livestock use in both WSAs because water structures needed to support current cattle numbers would not be built. If Turtle Mountain WSA is designated wilderness, livestock use in Gila Box WSA would decrease 18 AUMs (1½ cows yearlong) from 587 to 569. Because this is such a small change in the amount of use and because livestock numbers would not change in Gila Box WSA unless affected by designations in the adjacent Turtle Mountain WSA, this analysis will assume livestock use would not change in the Gila Box WSA.

Recreation Use. Under these alternatives, recreation uses would continue. The major uses in the WSA would be off-road vehicle (ORV) use (about 1,000 RVDs annually), fishing (750 RVDs), floatboating (500 RVDs), hunting (150 RVDs) and hiking/backpacking (100 RVDs). Nearly all recreation use would occur along the Gila and San Francisco Rivers. In the next 10 years total motorized recreation would be managed to keep use levels at 1,000 RVDs annually and non-motorized uses would increase to 2,500 RVDs. Beyond the 10-year period, use in all activities would continue to increase. No trails or recreation facilities exist in the WSA and none would be built in or beyond the next 10 years.

Land Use. An 80-acre private inholding is located in the eastern part of the WSA. A request for access to the inholding would not occur in the next 10 years or beyond.

Wildlife Habitat Projects. To improve wildlife habitat in the WSA, BLM would fence the Gila and San Francisco Rivers to manage livestock grazing in the canyon bottoms and plant riparian trees (cottonwood, willow, walnut and sycamore trees) to re-establish their populations along the rivers. Fencing 15 miles of the Gila and three miles of the San Francisco would require only five miles of fence built at strategic locations where cattle walk down to the river. No roads would be constructed. Tree planting would require each tree to be fenced for protection from cattle and other wildlife, and watered by a drip irrigation system for the first year or two of its life. Materials would be flown in by helicopter and carried in by raft. Once planted, each site would need to be maintained every two to three weeks. Access for maintenance would be by foot, horseback, boat or off-road vehicle.

To improve the distribution of threatened and endangered wildlife species, BLM, U.S. Fish and Wildlife Service and Arizona Game and Fish Department (AGFD) would introduce the federally-listed endangered woundfin to the Gila River. No support structures or surface disturbance would be necessary. To re-establish bighorn sheep into their historic range, BLM and AGFD would release desert bighorn sheep into the Gila Box. The release would not require any structures (fences) or surface disturbance and would use existing roads for access. These projects would occur in the next 10 years. Beyond the 10-year period, riparian tree planting efforts would continue.

ALL WILDERNESS. *All Wilderness* would designate all 17,831 of Gila Box WSA as wilderness and enclose 80 acres of private land (see Map 25). The anticipated management actions under this alternative would be the same as described for the *Proposed Action* and *No Wilderness (No Action)* except for Minerals and Energy Operations, Recreation Use and Wildlife Habitat Projects.

Minerals and Energy Operations. The anticipated management actions under this alternative would be the same as those described for the *Proposed Action* and *No Wilderness (No Action)* — no minerals or energy operations. The wilderness, however, would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation to conduct mining in the wilderness would be examined to determine the validity of the mining claims.

Recreation Use. The recreation uses in the wilderness would be the same as those described for the *Proposed Action* and *No Wilderness (No Action)* except that ORV use would not be allowed. This would result in the elimination of about 1,000 RVDs annually over the next 10 years. With the elimination of motorized recreation, non-motorized recreation uses such as hiking, backpacking and floatboating would increase to about 3,500 RVDS annually over the next 10 years.

Wildlife Habitat Projects. The wildlife projects expected under this alternative would be the same as those described for the *Proposed Action* and *No Wilderness (No Action)* except that ORVs would not be allowed for transportation into the wilderness to install and maintain the tree plantings.

ENHANCED WILDERNESS. *Enhanced Wilderness* would designate 15,272 acres of Gila Box WSA as wilderness, enclosing 80 acres of private land. The nondesignated 2,559 acres are in the eastern end of the WSA upstream from the confluence of the Gila and San Francisco Rivers (see Map 25). The wilderness boundary excludes the area of geothermal energy potential and part of the area of ORV use. The anticipated management actions under this alternative would be the same as those described for *All Wilderness* except for Recreation Use and Wildlife Habitat Projects.

Recreation Use. The recreation uses under this alternative would be the same as those described under *All Wilderness* except that ORV use would still be allowed on the Gila and San Francisco Rivers upstream from their confluence. This would result in the elimination of 500 RVDs annually over the next 10 years. With the elimination of some of the ORV use, non-motorized uses such as hiking and backpacking would increase to about 3,500 RVDs annually over the next 10 years.

Wildlife Habitat Projects. The wildlife projects expected under this alternative would be the same as those described for *All Wilderness* except that ORVs would be allowed for transportation to plant and maintain riparian trees upstream from the confluence of the Gila and San Francisco Rivers.

MODERATE WILDERNESS. *Moderate Wilderness* would designate 10,192 acres of wilderness surrounding the Gila Box and Camelsback area. The nondesignated areas total 7,639 acres in the northern and eastern part of the WSA (see Map 25). The wilderness boundary excludes the area of geothermal energy potential, a private inholding and part of the area of ORV use. The anticipated management actions under this alternative would be the same as those in the *Proposed Action* and *No Wilderness (No Action)* except for Minerals and Energy Operations, Recreation Use, Land Uses and Wildlife Habitat Projects.

Minerals and Energy Operations. Activities under this alternative would be the same as those described for the *Proposed Action* and *No Wilderness (No Action)* — no minerals or energy operations. The wilderness, however, would not be open to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Plans of operation to conduct mining in the wilderness would be examined to determine the validity of the mining claims.

Recreation Use. The recreation uses under this alternative would be the same as those described for the *Proposed Action* and *No Wilderness (No Action)*, except that ORV use would not be allowed on the Gila River downstream from Eagle Creek. This would result in the elimination of about 500 RVDs annually over the next 10 years. With the elimination of motorized recreation, nonmotorized uses like hiking and backpacking would increase to about 3,500 RVDs annually in the next 10 years.

Land Uses. Under this alternative the 80-acre private inholding would not be within the wilderness.

Wildlife Habitat Projects. The wildlife projects expected under this alternative would be the same as described for *All Wilderness* except that ORVs would be allowed for transportation to plant and maintain riparian trees upstream from Eagle Creek on the Gila and San Francisco Rivers.

TURTLE MOUNTAIN

AZ-040-22/23/24(B) (Map 26)

PROPOSED ACTION, MODERATE WILDERNESS AND NO WILDERNESS (NO ACTION). These alternatives would not designate any of Turtle Mountain WSA's 17,422 acres as wilderness (see Map 26).

Aircraft Overflights. The Air National Guard would conduct military training flights over the WSA for the next 10 years. The number of flights is not known but they would be from 1,500 to 51,000 feet above ground level and last from one to two minutes.

Minerals and Energy Operations. The WSA would be open for mineral and energy exploration and development but no such activities would occur under these alternatives in the next 10 years. Because the WSA lies between two large copper ore deposits, it is considered to have some mineral potential. It is unknown whether mineralized rock lies below the volcanic cover of the WSA but if it does, it may be as much as 2,300 to 6,300 feet below the surface of the WSA. The land in the WSA is classified as prospectively valuable for geothermal resources. Within current technology, however, there would be no foreseeable economic uses of the geothermal energy. Projections beyond the 10-year period do not show any mineral or energy exploration or production activities.

Noises from the adjacent mine and smelter at Morenci would be heard in the WSA on occasion.

Livestock Grazing Operations. Livestock use in the WSA would be maintained at 2,743 animal unit months (AUMs) for the next 10 years and beyond. Fourteen dirt dams, three rock and concrete dams, seven developed springs, three storage tanks, 10 troughs and eight miles of pipeline, two rock and concrete storage tanks, two corrals and 14 miles of fence would be maintained throughout the next 10 years. Additional facilities to be built include eight miles of pipeline, three storage tanks and seven troughs; two spring developments; two traps with about three-quarters mile of fence and stock-trail. Projections beyond the 10-year period show no additional facilities would be built, but existing facilities would be maintained.

Recreation Use. Under these alternatives, recreation uses in the WSA would continue. The major uses include hiking (100 recreation visitor days — RVD — annually), off-road vehicle (ORV) use (50 RVDs) and hunting (75 RVDs). In the next 10 years total use would increase to about 500 RVDs and all uses would continue to increase beyond the 10-year period. The Safford-Morenci Trail (a historic trail used by hikers), which crosses the northern end of the WSA, would be maintained. No other recreation facilities exist and none would be constructed.

Land Use. Three private inholdings and one state inholding are in the WSA. In the next 10 years, a request for vehicle access to the state inholding would be made, but no additional requests for access would occur beyond the 10-year period.

Wildlife Habitat Projects. To improve wildlife habitat in the WSA, BLM would construct a 100-acre study exclosure on the Turtle Mountain ridgeline, rebuild the livestock exclosures in South Smith Canyon and develop a spring in Hot Springs Canyon to provide water for wildlife. Neither of these projects would require new roads or significant surface disturbance. Materials and labor would be flown or packed in. The exclosures in South Smith Canyon would be maintained in the next 10 years and beyond.

ALL WILDERNESS. *All Wilderness* would designate all 17,422 acres of Turtle Mountain WSA as wilderness and would enclose 285 acres of private land and 640 acres of state land (see Map 26). The anticipated management actions under this alternative would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*, except for Minerals and Energy Operations, Livestock Grazing Operations, Recreation Use and Wildlife Habitat Projects.

Minerals and Energy Operations. The anticipated minerals and energy actions under this alternative would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* — no minerals and energy operations. The wilderness, however, would not be open to entry under the mining and mineral leasing laws, subject to valid existing rights. Any plans of operation to conduct mining in the wilderness would be examined to determine the validity of the mining claims.

Livestock Grazing Operations. Livestock use would be reduced to 2,444 AUMs in the wilderness for the next 10 years. Projections beyond the 10-year period show the same level of use. Fourteen dirt dams, three rock and concrete dams, seven developed springs, three storage tanks, 10 troughs and eight miles of pipeline, two rock and concrete storage tanks, two corrals and 14 miles of fence would be maintained throughout the next 10 years. No additional facilities would be constructed due to cumulative impacts on the natural values of the wilderness. Projections beyond the 10-year period show continued maintenance of existing facilities but no new construction.

Recreation Use. Recreation use under this alternative would be the same as that described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would be prohibited. This would result in the elimination of 50 RVDs annually.

Wildlife Habitat Projects. Wildlife habitat projects would not be constructed in the wilderness due to cumulative impacts on the natural values of the wilderness. The livestock exclosures in South Smith Canyon would be rebuilt in the next 10 years and beyond.

ENHANCED WILDERNESS. *Enhanced Wilderness* would designate 9,104 acres of Turtle Mountain WSA as wilderness and enclose 640 acres of state land. The remaining 8,318 acres surrounding the WSA's core would not be designated wilderness. The nondesignated areas contain all of the private inholdings, the area of potential geothermal energy, and several livestock facilities. The eastern wilderness boundary follows section lines and the remaining boundaries follow ridgelines. The anticipated management actions under this alternative would be the same as described for *All Wilderness*, except for Livestock Grazing Operations.

Livestock Grazing Operations. Livestock use under this alternative would be the same as that described for *All Wilderness* except that the level of use would be reduced to 2,493 AUMs. The pipeline system proposed on the Bull Gap Allotment would be built in the area not designated wilderness.

JAVELINA PEAK

AZ-040-48 (Map 27)

PROPOSED ACTION, MODERATE WILDERNESS AND NO WILDERNESS (NO ACTION). These alternatives would not designate any of Javelina Peak WSA's 18,853 acres as wilderness (see Map 27).

Aircraft Overflights. The Air National Guard would conduct military training flights over the WSA for the next 10 years. The number of flights is not known but they would be from 1,500 to 51,000 feet above ground level and last for one to two minutes.

Minerals and Energy Operations. The WSA would be open to mineral and energy exploration and development but no such activities would occur in the WSA in the next 10 years. While zeolite minerals may be found north and south of the WSA and uranium minerals north of the WSA, production potential for these minerals in the WSA is low. The potential for other minerals is unknown. The WSA contains 8,300 acres classified as prospectively valuable for geothermal resources. There is potential for direct heat application but, due to its geographic location, there would be no foreseeable economic use of the geothermal energy. Projections beyond the next 10 years do not show any mineral or energy activities.

Livestock Grazing Operations. Livestock use in the WSA would be maintained at 737 animal unit months (AUMs) for the next 10 years. Projections beyond 10 years show the same level of use. Two rock and concrete dams, 10 miles of fence, three dirt dams, and a series of eight small rock and concrete dams with seven small silt trap dams would be maintained throughout the next 10 years. No additional facilities would be constructed in the WSA in the next 10 years. Projections beyond the 10-year period show no additional facilities would be constructed but existing facilities would be maintained.

Recreation Use. The major recreation activity in the WSA would be off-road vehicle (ORV) use on the dunes in the southern part of the WSA. Use totals about 1,500 recreation visitor use days (RVDs) annually and would increase to 2,500 RVDs annually in the next 10 years. The other main activity is hunting, but use would be light (about 50 RVDs). In the next 10 years hunting would increase to 250 RVDs annually. Beyond the 10-year period use would increase annually. No recreation facilities exist and none would be built in the WSA in or beyond the next 10 years.

Land Use. One private inholding (40 acres) is in the WSA, but a request for access is not expected in the next 10 years or beyond. Four parcels of split-estate land (federal surface and State of Arizona subsurface ownership) are on the perimeter of the WSA (see Map 27). A request for access to state minerals or development of state mineral resources would not occur in the next 10 years. In the next 10 years the state mineral estate would be acquired by BLM through subsurface exchange.

Wildlife Habitat Projects. In the next 10 years no habitat improvement projects would be constructed in the WSA but two catchments, storages, drinkers and livestock exclosures would be maintained. Beyond the next 10 years no additional habitat improvement measures would be implemented.

ALL WILDERNESS. *All Wilderness* would designate all 18,853 acres of Javelina Peak WSA as wilderness (see Map 27). Forty acres of private land and 1,650 acres of state minerals (subsurface) would be in the wilderness. The management actions anticipated under this alternative would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except for Minerals and Energy Operations and Recreation Use.

Minerals and Energy Operations. The anticipated mineral and energy actions would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* — no mining activities. The wilderness, however, would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation to conduct mining in the wilderness would be examined to determine the validity of the mining claims.

Recreation Use. The existing ORV use of the dunes in the southern part of the WSA would not be allowed, resulting in the elimination of 1,500 RVDs annually and 2,500 RVDs annually over the next 10 years. Hunting would continue as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*. With wilderness designation, uses such as hiking and backpacking would increase to a level of about 50 RVDs annually throughout the next 10 years. Projections beyond the 10-year period show continued small increases in wilderness uses annually.

ENHANCED WILDERNESS. *Enhanced Wilderness* would designate 7,035 acres of the Javelina Peak WSA as wilderness (see Map 27), including 195 acres of state minerals (subsurface), focusing on the Whitlock Mountains. It would not designate 11,818 acres of the WSA that include a private inholding, a cherrystem road, vehicle ways, abandoned roads and borrow areas and an ORV use area. The boundaries follow section lines and roads. The management actions anticipated under this alternative would be the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except for Minerals and Energy Operations, Recreation Use and Land Use.

Minerals and Energy Operations. The anticipated mineral and energy actions would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* — no mining activity. The wilderness, however, would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation to conduct mining in the wilderness would be examined to determine the validity of the mining claims.

Recreation Use. The existing ORV use (1,500 RVDs annually) in the dunes of the southern part of the WSA would continue because that area would not be designated wilderness. In the next 10 years ORV use would increase to 2,500 RVDs annually. Hunting would continue as described under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action* alternatives). With wilderness designation, uses such as hiking and backpacking would increase to a level of about 50 RVDs per year for the next 10 years. Projections beyond the 10-year period show continued small increases in wilderness uses.

Land Use. Under *Enhanced Wilderness*, the private inholding and all state minerals except T. 10 S., R. 29 E., Sec. 16 would not be in the wilderness. A request for access to the state minerals would not occur in the next 10 years. The state mineral estate, however, would be acquired by BLM through subsurface exchange.

PELONCILLO MOUNTAINS

AZ-040-60 (Map 28)

PROPOSED ACTION, MODERATE WILDERNESS AND NO WILDERNESS (NO ACTION). These alternatives would not designate any of the Peloncillo Mountains' 12,317 acres as wilderness (see Map 28).

Minerals and Energy Operations. The WSA would be open to mineral and energy exploration but development is not probable because the WSA is not considered valuable for geothermal resources, oil and gas resources or minerals. The possibilities for economic mineralization are largely speculative, based on the theory that mineralization could lie beneath the volcanic cover of the WSA. Projection beyond the 10 years show no mineral or energy exploration or production activities.

Livestock Grazing Operations. Livestock use in the WSA would be maintained at 1,384 animal unit months (AUM) for the next 10 years. Projections beyond that period show the same level of use. The following facilities would be maintained for the next ten years: eight dams (dirt or concrete); two pipeline systems (about 1 mile) and four small storages; two jet tanks; a developed spring and a rock and concrete storage; and two small rock and concrete dams, a pipeline, a diversion dike and a dirt dam; and 15 miles of fence. In the next 10 years a rock and concrete dams and two small storage tanks would be built (projects previously approved but not yet constructed). Projections beyond the 10-year period show no additional facilities would be built but existing facilities would be maintained.

Recreation Use. Existing recreation uses would continue in the WSA. Major uses include hunting (about 50 recreation visitor days — RVD —annually), off-road vehicle (ORV) use (50 RVDs) and rockhounding (50 RVDs). In the next 10 years, total use of all activities would increase to about 500 RVDs annually. Projections beyond the next 10 years show continued small increases in use each year. No recreation facilities exist and none would be built in the next 10 years.

Land Use. There are 760 acres of state minerals in the northwestern part of the WSA (see Map 28). No request for access to the mineral estate for exploration or production would occur. Projections beyond the next 10 years show no need for access for mineral and energy activities.

Wildlife Habitat Projects. To improve wildlife (primarily bighorn sheep) habitat in the WSA over the next 10 years, two wildlife water developments would be maintained. The sites include a small rock and concrete dam to supply water for a small storage tank and drinker and a livestock exclosure. Beyond the next 10 years, no additional facilities would be constructed but the existing facilities would be maintained. To expand their range, desert bighorn sheep would be released into the Peloncillo Mountains in the WSA.

ALL WILDERNESS. *All Wilderness* would designate all 12,317 acres of Peloncillo Mountains WSA as wilderness (see Map 28). The anticipated management actions would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except for Mineral and Energy Operations and Recreation Use.

Minerals and Energy Operations. The anticipated minerals and energy activities would be the same as those described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* — no exploration or production activities. Under this alternative, however, the wilderness would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation to conduct mining in the wilderness would be examined to determine the validity of the mining claims.

Recreation Use. The existing rockhounding and hunting uses would continue in the wilderness. Off-road vehicles, however, would not be permitted, resulting in the elimination of 50 RVDs of use annually. With designation, wilderness uses like hiking and backpacking would increase to about 50 RVDs per year. In the next 10 years, total use of all activities would increase to about 500 RVDs annually. Projections beyond the next 10 years show continued increases each year. No recreation facilities exist and none would be built in the wilderness in the next 10 years.

ENHANCED WILDERNESS. *Enhanced Wilderness* would designate 10,418 acres of Peloncillo Mountains WSA as wilderness. It would not designate 1,899 acres on the WSA's southern and southeastern sides (see Map 28) that include several livestock facilities. Boundaries of the wilderness would follow land forms. The anticipated management actions would be the same as described for *All Wilderness,* except that ORV use would continue in the areas not designated wilderness.

DOS CABEZAS MOUNTAINS
(formerly Happy Camp Canyon)
AZ-040-65 (Map 29)

PROPOSED ACTION AND MODERATE WILDERNESS. These alternatives would designate 11,998 acres of Dos Cabezas Mountains WSA as wilderness. The boundary would follow topographic features and property lines and include primarily the Happy Camp Canyon watershed. The 6,511 acres not designated wilderness would be in the western, northwestern and southern part of the WSA (see Map 29) and include known mineralized areas.

Aircraft Overflights. The U.S. Air Force would conduct about 245 military training flights per year over the WSA for the next 10 years and beyond. Flights of one or more aircraft would be from 500 to 1,500 feet above ground level and would last one to two minutes.

Minerals and Energy Operations. The wilderness would be closed to entry under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights. Any plans of operation to conduct mining in the wilderness would be examined to determine the validity of the mining claims. The number of mineral occurrences in and around the WSA show strong potential for mineral development. In the next 10 years there would be no mineral exploration or production in the wilderness, but just west of the wilderness, in the Buckeye Canyon part of the WSA, a mine would be developed and minerals produced. Based on previous interest in development of this area, 115 acres of surface disturbance (in a total project area of 240 acres) would occur through road building and development of the mine. Within the project area, two old mines would be developed. These sites include the Buckeye Mine on the east side of Buckeye Canyon and the Apache Mine on the west side. To access the Buckeye Mine two miles of road would be built, disturbing 14 surface acres. From the Buckeye Mine a 1,900-foot tram would be built to haul ore across Buckeye Canyon to a point where it would be loaded into trucks. A one-half mile long road would be built to access the tram on the west side of Buckeye Canyon, disturbing one acre. Below and around the Buckeye Mine (an underground operation), an area of 50 acres would be disturbed by mining and waste rock disposal. Across Buckeye Canyon around the Apache Mine, 30 acres would be disturbed. About 20 acres of Buckeye Canyon itself downstream of the mining operation would be disturbed by waste rock and possible road construction.

Parts of the eastern half of the WSA are under oil and gas lease. Because the WSA is not considered valuable for oil and gas or geothermal energy, there would be no exploration or production.

Livestock Grazing Operations. Livestock use in the WSA would be maintained at 1,599 animal unit months (AUM) for cattle for the next 10 years and beyond. Eighteen miles of fence, 12 developed springs, and one well would be maintained throughout the 10-year period. During this period, three miles of pasture fence would be built. Beyond the 10-year period existing facilities would be maintained.

Recreation Use. The area designated wilderness would be closed to off-road vehicle (ORV) use, eliminating less than 100 recreation visitor days (RVDs) per year in Happy Camp and Howell Canyons. Hunting (100 RVDs) and rockhounding (50 RVDs) would continue in the wilderness. In the next 10 years, ORV use would decrease in the WSA but wilderness uses such as hiking and backpacking would increase. Total use of all recreation activities in the WSA would increase to about 1,000 RVDs annually. No recreation facilities or trails exist in the wilderness and none would be built in the next 10 years.

Wildlife Habitat Projects. To improve wildlife habitat, BLM constructed a small masonry dam, pipeline and storage at two locations in the WSA, and also a livestock exclosure around each water development and a 60-acre study exclosure. These wildlife facilities would be maintained for the next 10 years but no additional facilities would be constructed. Beyond the 10-year period no facilities would be built but existing facilities would continue to be maintained.

ALL WILDERNESS. *All Wilderness* would designate all 18,509 acres of Dos Cabezas Mountains WSA as wilderness and enclose 258 acres of private land (see Map 29). The anticipated management actions under this alternative would be the same as described for the *Proposed Action* and *Moderate Wilderness* except for Minerals and Energy Operations, Recreation Use and Land Use.

Minerals and Energy Operations. The minerals and energy actions anticipated under *All Wilderness* would be the same as those described for the *Proposed Action* and *Moderate Wilderness*. Because of its valid existing rights, the mining operation in Buckeye Canyon would be established.

Recreation Use. The anticipated recreation uses under this alternative would be the same as those described for the *Proposed Action* and *Moderate Wilderness* except that all ORV use would be prohibited. About 100 RVDs annually would be stopped in Happy Camp, Howell, Sheep and Wood Canyons.

Land Use. Under *All Wilderness*, 258 acres of private land in four separate parcels would be within the wilderness boundary (see Map 29). No request for access to the private inholdings is expected in or beyond the next 10 years.

ENHANCED WILDERNESS. *Enhanced Wilderness* would designate 14,555 acres of Dos Cabezas Mountains WSA as wilderness and enclose 40 acres of private land. It would not designate 3,954 acres in the western and southern parts of the WSA, areas of current and potential mineralization. Wilderness boundaries would follow section lines. The anticipated management actions under *Enhanced Wilderness* would be the same as described for the *Proposed Action* and *Moderate Wilderness* except for Land Use.

Land Use. Under this alternative, 40 acres of private land would be within the wilderness boundary (see Map 29). No request for access to the private inholding is expected in or beyond the next 10 years.

NO WILDERNESS (NO ACTION). *No Wilderness* would not designate any of Dos Cabezas Mountains WSA's 18,509 acres as wilderness. The management actions anticipated under this alternative would be the same as those in the *Proposed Action* and *Moderate Wilderness* except for Minerals and Energy Operations and Recreation Use.

Minerals and Energy Operations. The WSA would be open for mineral and energy exploration and development, including the mining operations in Buckeye Canyon described under the *Proposed Action* and *Moderate Wilderness*. Projections beyond that time period show no further mining development.

Recreation Use. Under this alternative, current recreation uses, including off-road vehicle (ORV) driving (100 RVDs annually), hunting (100 RVDs) and rockhounding (50 RVDs) would continue. Total use in the next 10 years would be about 1,000 RVDs. Beyond the 10-year period all activities would continue to increase. No recreation trails or facilities exist and none would be built in or beyond the next 10 years.

TABLE 2-3
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

NEEDLE'S EYE

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
WATER QUALITY	There would be no significant decrease in water quality from upgrading to powerline. Construction and maintenance of livestock exclosures and tree planting would improve water quality. ORV use on the vehicle way forming the boundary of the area recommended for wilderness would have minimal impacts on water quality due to erosion and sedimentation.	Same as the *Proposed Action* except no ORV use would occur, eliminating minimal impacts to water quality.	Same as the *Proposed Action* except no ORV use would occur, eliminating minimal impacts to water quality.	Same as the *Proposed Action.*	Impacts to water quality the same as the *Proposed Action*. In addition, water quality would be temporarily degraded due to ranch road construction.
WATER SUPPLY	There would be no impact to water supply under any alternative.				
VEGETATION	The *Proposed Action* would preserve 9,201 acres of the creosotebush/bursage PNV type. Continuation of other resource uses would have no adverse impact to vegetation. Livestock exclosure fences and tree planting in the Gila River and Mescal Creek would improve riparian vegetation.	*All Wilderness* would preserve 9,716 acres of the creosotebush/bursage PNV type with impacts to vegetation the same as the *Proposed Action.*	Same as *All Wilderness.*	Same as the *Proposed Action.*	Same as the *Proposed Action* except 2½ miles of ranch road construction would remove about 6 acres of vegetation.
THREATENED AND ENDANGERED PLANTS	The *Proposed Action* would preserve two T&E species thought to occur in the WSA. Anticipated management actions would not adversely impact T&E species.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action*	Although wilderness management would not add to the preservation of T&E species, planned livestock, recreation, utility and wildlife activities would not adversely impact T&E species.
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	The *Proposed Action* would preserve the natural qualities and opportunities for solitude and primitive recreation. Special features would also be preserved. Existing military, utility, range and wildlife uses would continue without	Same as the *Proposed Action* except ORV use of the vehicle way in the eastern part of the area recommended for wilderness would not be allowed improving opportunities for solitude in that area.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Nondesignation would result in the permanent loss of natural values in the eastern part of the WSA due to ranch road construction. Recreation would shift from primitive to motorized forms and opportunities for solitude

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

NEEDLE'S EYE (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
	significant impact to wilderness values. Wilderness designation would expand the vegetation diversity of the NWPS. The area would be manageable as wilderness.				would decrease. The WSA would not be manageable as wilderness under this alternative.
Acres Given Wilderness Protection	9,201	9,716	9,716	9,201	0
MINERALS AND ENERGY	There would be no significant impact to mineral or energy development under any alternative.				
Mining Claims	17	22	22	17	0
Acres Under Oil and Gas Lease	0	0	0	0	0
LIVESTOCK GRAZING	The *Proposed Action* would not significantly impact grazing operations because most planned facilities would be built and livestock numbers would be unaffected. Range condition would improve with better cattle distribution and forage utilization.	Same as the *Proposed Action* except that the vehicle way in the eastern part of the area recommended for wilderness would not be used by motorized vehicles for livestock gathering operations.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Same as *All Wilderness* except that a 2½ mile long road would be built from the vehicle way to Dick Spring for use in livestock gathering and management of the allotment.
RECREATION	The *Proposed Action* would not impact existing recreation uses, including ORV use. Primitive recreation would increase to 500 RVDs and be temporarily impacted by aircraft overflights. Wildlife habitat projects would improve opportunities for hunting and wildlife viewing.	Same as the *Proposed Action* except ORV use of the vehicle way in the eastern part of the area recommended for wilderness would be prohibited eliminating 50 RVDs of use per year.	Same as *All Wilderness.*	Same as the *Proposed Action.*	*No Wilderness* would result in increased vehicle access and motorized recreation from road construction to Dick Spring. Opportunities for primitive recreation would decrease. Impacts of existing military, utility and wildlife uses would be the same as the *Proposed Action.*
Miles of Vehicle Ways Closed	1	2	2	1	0
Acres Closed to ORV Use	9,201	9,716	9,716	9,201	0
WILD AND SCENIC RIVERS	Wilderness would preserve the values that make the	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	*No Wilderness* would not designate wilderness but

	Gila River eligible for inclusion in the NWSRS.				river values would not be adversely impacted. Livestock exclosures and tree planting would improve river values by improving riparian habitat.
Miles of River Protected	12	12	12	12	0
LAND USE	Wilderness management would have no significant adverse impact on maintenance or upgrading of the 44 kv powerline. Construction of 3 hydroelectric dams would not occur. The Gila River watershed protection withdrawal would be enhanced.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	There would be no impact on the powerline, dam withdrawals or watershed protection withdrawal.
WILDLIFE	Wilderness designation would generally benefit wildlife and their habitat. This alternative would have no adverse impact to wildlife. Continued military, ORV and utility flights would temporarily disturb wildlife but impacts would not be significant. Wildlife and their habitat would improve from construction and maintenance of livestock exclosures and tree planting.	Same as the *Proposed Action* except ORV use on the vehicle way in the eastern part of the area recommends for wilderness would be prohibited, eliminating temporary disturbance of wildlife.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Same as the *Proposed Action.* In addition, road construction to Dick Spring would disturb wildlife during construction and use of the road.
THREATENED AND ENDANGERED WILDLIFE	Reintroduction of native fish and riparian habitat improvement projects would benefit T&E species. Other existing uses would not significantly impact T&E birds or bighorn sheep.	Same as the *Proposed Action* except ORV use would be prohibited, eliminating this temporary impact on T&E species.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Same as the *Proposed Action.* In addition, road construction to Dick Spring would disrupt T&E species during construction and use of the road. Increased vehicle use and presence of people would result in additional pressure to T&E species.
CULTURAL RESOURCES	There would be no significant impact to cultural resources under any alternative.				
PALEONTOLOGICAL RESOURCES	The *Proposed Action* would protect and preserve fossils found in the area recommended for wilderness. No adverse impacts to fossils would occur.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Road construction to Dick Spring would impact fossils if they were located along the proposed route.

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

NEEDLE'S EYE (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
VISUAL RESOURCES	The area recommended for wilderness would be managed as a VRM Class I area, preserving scenic quality. The area not recommended would retain its previous Class I status, preserving scenic quality.	Same as the *Proposed Action* except the entire WSA would be recommended for wilderness, preserving scenic quality.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Scenic quality would be maintained. Road construction would be designed to minimize impacts to scenery.
Acres Changed to VRM Class I Management	0	0	0	0	0
ECONOMIC CONDITIONS	There would be no significant impact to economic conditions under any alternative.				
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				
			BLACK ROCK		
WATER QUALITY	There would be no significant impact to water quality. Cattle concentrations around stock ponds would leave the water unsuitable for human use. Livestock exclosure fences in Black Rock Creek would improve water quality. Development of a mine outside the recommended area would not adversely impact water quality.	Same as the *Proposed Action* except the mine would occur in the recommended area.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Same as the *Proposed Action.* In addition ORV use along Fourmile Canyon vehicle way would result in increased erosion, sedimentation and degraded water quality. Impacts would not be significant because use levels are low.
WATER SUPPLY	There would be no impact to water supply under any alternative.				
VEGETATION	Wilderness management would preserve 6,590 acres of the grama/tobosa shrubsteppe PNV type. In the area recommended for wilderness, continuation of existing uses would not impact vegetation. In the area not recommended, 10 acres of vegetation would be removed due to mining. Exclosure fences around riparian trees would result in improved stands of riparian vegetation.	Wilderness management would preserve 8,492 acres of the grama/tobosa shrubsteppe PNV type. Impacts to vegetation would be the same as the *Proposed Action* except that the impacts to vegetation caused by the mining operation would occur in the area recommended for wilderness.	Same as *All Wilderness.*	Same as the *Proposed Action.*	*No Wilderness* would not recommend any wilderness but impacts to vegetation would be the same as the *Proposed Action.*

AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	Wilderness designation would preserve 6,590 acres of high quality wilderness values. Other resource uses would continue without significant impact to wilderness values. Designation would expand the existing Santa Teresa Wilderness from 26,780 to 33,370 acres. A mining operation would permanently impact the natural values of 10 acres of the area not recommended for wilderness. The area recommended for wilderness would be manageable as wilderness.	*All Wilderness* would preserve all 8,492 acres of the WSA with impacts the same as *Proposed Action* except that the mining operation would occur in the area recommended for wilderness permanently impacting natural values on 10 acres north of Jackson Mountain. This part of the area recommended for wilderness would not be manageable.	*Enhanced Wilderness* would preserve 7,614 acres of the WSA as wilderness with impacts the same as the *Proposed Action.*	Same as the *Proposed Action.*	No designation would result in the permanent loss of natural values on 10 acres in the eastern part of the WSA. In the rest of the WSA, wilderness values would not be significantly impacted.
Acres Given Wilderness Protection	6,590	8,492	7,614	6,590	0
MINERALS AND ENERGY	There would be no impact to mineral or energy development in the area recommended for wilderness. In the area not recommended, a mine would be developed north of Jackson Mountain.	Same as the *Proposed Action* except that the mine north of Jackson Mountain would be developed in the area recommended for wilderness because a valid existing right would be established by the date of designation.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	*No Wilderness* would have no impact on mineral and energy development.
Mining Claims	0	6	0	0	0
Acres Under Oil and Gas Lease	0	0	0	0	0
LIVESTOCK GRAZING	There would be no adverse impact to livestock operations. Range facilities, needed for better livestock distribution and forage utilization, would be built and range condition would improve.	*All Wilderness* would have the same impact on livestock grazing as the *Proposed Action* except that all needed facilities would be constructed in the area recommended for wilderness.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	*No Wilderness* would have no impact on livestock grazing.
RECREATION	The *Proposed Action* would prohibit ORV use of Fourmile Canyon way, eliminating 50 RVDs of use per year. Opportunities for primitive recreation would improve and increase from a total of 225 RVDs per year to 1,000 RVDs per year in the next 10 years. In the area not recommended for wilderness, mining operations would adversely impact recreation uses.	Same as the *Proposed Action* except that the mining operation would occur in the area recommended for wilderness impacting opportunities for primitive recreation.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	ORV use of Fourmile Canyon way would continue (50 RVDs annually) and increase at the expense of opportunities for primitive recreation. In the remainder of the WSA, impacts would be the same as the *Proposed Action.*

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

BLACK ROCK (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
Miles of Vehicle Way Closed	1½	1½	1½	1½	0
Acres Closed to ORV Use	6,590	8,492	7,614	6,590	0
LAND USE	The San Carlos Apache Tribe and adjacent private property owners would continue to have visitor-related problems but access to the area recommended for wilderness would continue on the Black Rock Road.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Recreation use of the Black Rock area would continue and access across the Reservation would still lead to visitor-related problems. Access would remain open.
WILDLIFE	Wilderness designation would generally benefit wildlife and their habitat. Wildlife would benefit and habitat would improve through construction of livestock exclosure fences in Black Rock Creek. In the area not recommended, construction of a livestock water would provide wildlife a permanent source of water but mining would disrupt wildlife and 10 acres of their habitat.	Same as the *Proposed Action* except the benefits of the livestock water and the disruption caused by mining would occur in the area recommended for wilderness.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
THREATENED AND ENDANGERED WILDLIFE	In the area recommended for wilderness, existing resource uses would not impact T&E species. In the area not recommended, development of a livestock water would provide an additional water source, benefiting T&E wildlife. Mining would adversely impact bighorn sheep.	Same as the *Proposed Action* except that all resource uses would occur in the area recommended for wilderness.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.* In addition, ORV use on the vehicle way in Fourmile Canyon would temporarily disrupt T&E wildlife.
CULTURAL RESOURCES	There would be no significant impact to cultural resources under any alternative.				
VISUAL RESOURCES	The area recommended for wilderness would be managed as a VRM Class I area, preserving scenic quality. The area not recommended would retain	The entire area recommended for wilderness would be managed as a VRM Class I area, preserving scenic quality except on the 10	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Scenic quality would be maintained because the WSA would retain its previous Class I status. In the eastern part of the WSA, the mining operation

	its previous Class I status, preserving scenic quality except on the 10 acres developed for mining. There, the visual quality would be adversely impacted.	acres developed for mining in the eastern part of the recommended area. In this area the visual quality would be adversely impacted.			would impact scenic quality on 10 acres of the WSA.
Acres Changed to VRM Class I Management	0	0	0	0	0
ECONOMIC CONDITIONS	There would be no significant impact to economic conditions under any alternative.				
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				

FISHHOOKS

WATER QUALITY	Livestock and ORV use would cause some impact to water quality but impacts would not be significant. Maintenance of exclosures would increase riparian vegetation, reduce erosion and improve water quality.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action* except that there would be more potential for erosion and degradation of water quality due to increased ORV use. Impacts, however, would not be significant.
WATER SUPPLY	An additional 30,000 gal. of water for livestock and wildlife would not not be developed under this alternative.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
VEGETATION	The *Proposed Action* would preserve 10,883 acres of the Transition PNV type, not represented in the NWPS. This alternative would also preserve two plant communities in near climax condition. Continued livestock grazing would not significantly impact vegetation. Maintenance of exclosures would improve riparian vegetation in Lower Fishhook Canyon. There would be no significant impact to vegetation in the area not recommended for wilderness.	This alternative would preserve 15,215 acres of the Transition PNV type with impacts the same as the *Proposed Action.*	Same as *All Wilderness.*	Same as the *Proposed Action.*	There would be no significant impacts to vegetation under this alternative. Exclosure fences would improve riparian vegetation in Lower Fishhook Canyon.
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	Wilderness designation would preserve the natural values and outstanding opportunities for solitude and primitive recreation on	*All Wilderness* would designate 15,215 acres with impacts the same as the Proposed Action.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Continued military, livestock, ORV and wildlife uses would have a minimal impact on wilderness values.

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

FISHHOOKS (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
	10,883 acres. Continued livestock, wildlife and military uses would not significantly impact wilderness values. ORV uses would be prohibited improving opportunities for solitude. The area recommended for wilderness would be manageable. In the area not recommended, wilderness values would not be significantly impacted.				
Acres Given Wilderness Protection	10,883	15,215	15,215	10,883	0
MINERALS AND ENERGY	There would be no significant impact to mineral or energy development under any alternative.				
Mining Claims	4	36	36	4	0
Acres Under Oil and Gas Lease	0	0	0	0	0
LIVESTOCK GRAZING	There would be no significant impact to livestock grazing. Grazing systems would be implemented, most needed facilities built and levels of use would remain the same. The result would be better livestock distribution, forage utilization and range condition. In the area not recommended, livestock use would increase 53 AUMs.	*Same as the Proposed Action* except all allotments would be located in the area recommended for wilderness and the increased livestock use would occur in the recommended area.	Same as *All Wilderness.*	Same as the *Proposed Action.*	There would be no impact on livestock grazing. Grazing systems would be implemented and most needed facilities built, resulting in improved distribution and utilization. Livestock use would increase 53 AUMs and range condition would improve.
RECREATION	This alternative would prohibit ORV travel, eliminating about 50 RVDs of use per year. Additional opportunities for primitive recreation would be available and increase to about 500 RVDs per year in the next 10 years. Military overflights would	*Same as the Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	*No Wilderness* would provide continued access for ORV travel. Motorized recreation would be enhanced and opportunities for primitive recreation would still be available as described for the *Proposed Action.*

	temporarily impact solitude and livestock fencing would improve wildlife habitat and opportunities for wildlife viewing and hunting.				
Miles of Vehicle Way Closed	3	3	3	3	0
Acres Closed to ORV Use	10,883	15,215	15,215	10,883	0
WILDLIFE	Wilderness designation would generally benefit wildlife and their habitat. Maintenance of exclosure fences would enhance and expand riparian vegetation, vital wildlife habitat. Wildlife populations would improve. Construction of three livestock waters would provide yearlong water for wildlife. Continued military overflights would temporarily disrupt wildlife, but impacts would not be significant. In the area not recommended, continued ORV use and increased livestock use would not significantly impact wildlife.	*Same as the Proposed Action* except that increased livestock use would occur in the area recommended for wilderness. Impacts to wildlife would not be significant because improved range condition can support additional use.	Same as *All Wilderness.*	Same as the *Proposed Action.*	*Same as the Proposed Action.* In addition ORV use would continue with temporary, insignificant impacts to wildlife.
THREATENED AND ENDANGERED WILDLIFE	This alternative would benefit T&E wildlife. Maintenance of livestock exclosures would improve habitat for T&E species and their populations. Continued military and livestock uses would not impact T&E wildlife significantly. In the area not recommended for wilderness, vehicle use of the cherrystem road would temporarily impact T&E wildlife.	*Same as the Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	*Same as the Proposed Action* except ORV use would continue on vehicle ways in the WSA impacting T&E species. Impacts would be minimal and temporary and therefore, not significant.
CULTURAL RESOURCES	There would be no significant impact to cultural resources under any alternative.				
VISUAL RESOURCES	The area recommended for wilderness would be managed as a VRM Class I area, preserving scenic quality. The area not recommended would return to its former Class IV status, providing less protection to natural	*Under this alternative, the entire WSA would be managed as a VRM Class I area, preserving scenic quality and natural values.*	Same as *All Wilderness.*	Same as the *Proposed Action.*	*Scenic quality would be maintained in the Fishhook Canyons part of the WSA because of its previous Class I designation. The remaining 8,485 acres would be managed as a Class IV area offering less*

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

FISHHOOKS (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
	values and natural, ecologic changes.				*protection to scenery. No major actions would occur, however, that would significantly impact scenic quality.*
Acres Changed to VRM Class I Management	4,153	8,485	8,485	4,153	0
ECONOMIC CONDITIONS	There would be no significant impact to economic conditions under any alternative.				
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				
			DAY MINE		
WATER QUALITY	There would be no significant impact to water quality. Livestock concentrations around stock ponds would leave water unfit for human use. ORV use would result in degradation of water quality but impacts would not be significant. Maintenance of exclosures would increase riparian vegetation, reduce erosion and improve water quality.	Same as the *Proposed Action* except that ORV use would not be allowed eliminating the impact to water quality.	Same as the *Proposed Action* except that ORV use would not be allowed on the vehicle way beyond Brushy Tank, eliminating the impact to water quality in the area recommended for wilderness. In the area not recommended, ORV use would continue with impacts the same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
WATER SUPPLY	There would be no impact to water supply under any alternative.				
VEGETATION	Livestock grazing and ORV use would continue without adverse impact to vegetation. Maintenance of exclosure fences would result in an improved riparian vegetation community.	*All Wilderness* would preserve 17,309 acres of the Transition PNV type, not currently represented in NWPS. Continued livestock and wildlife management projects would not significantly impact vegetation.	Same as *All Wilderness* except on 12,362 acres of the Transition PNV type would be preserved through wilderness management. Vegetation in the area not recommended for wilderness would not be significantly impacted.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	Day Mine WSA would not be designated wilderness but wilderness values	*All Wilderness* would preserve the natural values and opportunities	*Enhanced Wilderness* would preserve the natural values and opportunities	Same as the *Proposed Action.*	Same as the *Proposed Action.*

	would not be significantly impacted. Continued military, livestock, ORV and wildlife management uses would have minimal impacts on wilderness values.	for solitude and primitive recreation on all 17,309 acres of Day Mine WSA. Continued livestock grazing and wildlife management activities would not affect the quality of wilderness values. ORV use would be prohibited, improving opportunities for solitude. Continued military over-flights would temporarily impact solitude. The area recommended for wilderness would be manageable.	for solitude and primitive recreation on 12,362 acres of the WSA. This alternative would exclude lands with cherrystem roads, vehicle ways and range facilities, improving natural values and opportunities for solitude. Continuation of other resource uses would have the same impact as *All Wilderness*. Wilderness values on the lands not recommended would remain natural with minimal impacts to wilderness values. The area recommended would be manageable.		
Acres Given Wilderness Protection	0	17,309	12,362	0	0
MINERALS AND ENERGY	There would be no significant impact to mineral or energy development under any alternative.				
Mining Claims	0	1	1	0	0
Acres Under Oil and Gas Leases	0	0	0	0	0
LIVESTOCK GRAZING	Under this alternative there would be no impact to livestock grazing. Necessary facilities would be built to implement a grazing system, improving livestock distribution and range condition.	Same as the *Proposed Action* except all activities would occur in the area recommended for wilderness.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
RECREATION	ORV use would continue on cherrystem roads and vehicle ways. ORV and hunting use would increase from a total of 100 to 300 RVDs per year over the next 10 years at the expense of primitive activities like hiking and backpacking. Military overflights would temporarily impact recreation. Livestock and wildlife management facilities would improve wildlife habitat and opportunities for hunting and wildlife viewing.	ORV use would be prohibited, eliminating about 50 RVDs per year. *All Wilderness* would enhance opportunities for primitive recreation and over the next 10 years use would increase to about 500 RVDs per year. Existing military, livestock and wildlife management activities would continue with the same impact as the *Proposed Action.*	Same impact as *All Wilderness* except the vehicle way in the northwest part of the WSA would remain open. ORV use in the area recommended for wilderness would be prohibited eliminating about 25 RVDs per year. Primitive recreation use levels would increase to about 300 RVDs per year over the next 10 years.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
Miles of Vehicle Ways Closed	0	3	2	0	0
Acres Closed to ORV Use	0	17,309	12,362	0	0

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

DAY MINE (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
WILDLIFE	Wildlife and their habitat would improve. Maintenance of five exclosure fences would enhance wildlife habitat and thus wildlife. Construction of five livestock waters would also provide wildlife with dependable yearlong water. Continued military and ORV uses would not significantly impact wildlife.	Wilderness designation would generally benefit wildlife and their habitat. *All Wilderness* would have the same impact to wildlife as the *Proposed Action* except ORV use would not be permitted eliminating this impact to wildlife.	Same as *All Wilderness* except that ORV use would continue on the vehicle way in the northwest part of the WSA (not recommended for wilderness), causing a minimal disturbance to wildlife.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
THREATENED AND ENDANGERED WILDLIFE	This alternative would benefit T&E wildlife. Maintenance of five exclosure fences would preserve riparian habitat, important for T&E birds inhabiting the WSA. Existing military, livestock and ORV uses would not significantly impact T&E species.	Same as the *Proposed Action* except ORV use would be prohibited on vehicle ways in the northern part of the recommended area, eliminating impacts to T&E birds.	Same as the *Proposed Action* except ORV use on the vehicle way beyond Brushy Tank would be prohibited, eliminating impacts to T&E birds in that part of the recommended area.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
CULTURAL RESOURCES	There would be no significant impact to cultural resources under any alternative.				
VISUAL RESOURCES	The area around the Left Fork of Markham Creek (1,630 acres) would retain its VRM Class I designation, preserving scenic quality. The remainder of the WSA would return to its previous VRM Class IV status, offering less preservation of scenic values. No significant impacts to visual quality, however, would occur.	The entire area recommended for wilderness (17,309 acres) would be managed as a VRM Class I area, preserving scenic quality.	The area recommended for wilderness (12,362 acres) would be managed as a VRM Class I area, preserving scenic quality. The remaining 4,947 acres would return to its previous VRM Class IV status, offering less preservation of scenic quality. No significant impacts to visual quality, however, would occur.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
Acres Changed to VRM Class I Management	0	15,679	10,732	0	0
ECONOMIC CONDITIONS	There would be no significant impact to economic conditions under any alternative.				
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				

GILA BOX

WATER QUALITY	Continued livestock and ORV use would degrade water quality but impacts would not be significant. Riparian rehabilitation projects would restore stands of riparian vegetation and improve water quality.	Same as the *Proposed Action* except ORV use in the river canyon, would be prohibited, eliminating impacts to water quality caused by ORVs.	Same as the *Proposed Action* except ORV use would be prohibited downstream of the Gila and San Francisco Rivers' confluence, eliminating impacts to water quality caused by ORVs.	Same as the *Proposed Action* except ORV use would be prohibited downstream of the Gila River and Eagle Creek confluence, eliminating impacts to water quality caused by ORVs.	Same as the *Proposed Action.*
WATER SUPPLY	There would be no impact to water supply under any alternative.				
VEGETATION	Under this alternative, there would be no adverse impact to vegetation. Existing livestock and ORV uses would not impact vegetation. Fencing the river canyon to manage cattle and tree planting would improve stands of riparian vegetation.	*All Wilderness* would preserve 17,831 acres of the creosotebush/bursage and grama/tobosa shrubsteppe PNV types. Impacts would be the same as the Proposed Action except ORV use would be prohibited eliminating the minimal impact they have on vegetation in the river canyon.	*Enhanced Wilderness* would preserve 15,272 acres of the creosotebush/bursage and grama/tobosa shrubsteppe PNV types. Impacts would be the same as All Wilderness in the recommended area downstream of the confluence of the Gila and San Francisco Rivers. Upstream of the confluence, in the area not recommended, impacts would be the same as the Proposed Action.	*Moderate Wilderness* would preserve 10,192 acres of the creosotebush/bursage and grama/tobosa shrubsteppe PNV types. In the area recommended for wilderness downstream of the Gila River and Eagle Creek confluence, impacts would be the same as All Wilderness. In the area not recommended, upstream of the confluence, impacts would be the same as the Proposed Action.	Same as the *Proposed Action.*
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	Nondesignation would result in minimal, permanent impacts on wilderness values. Noise from ORV use, military overflights and the mine adjacent to the WSA would temporarily impact opportunities for solitude.	*All Wilderness* would preserve the natural values and opportunities for solitude and primitive recreation of all 17,831 acres. Temporary impacts to solitude would result from military overflightsand noise from the adjacent mine but impacts would not be significant. Restoration of riparian vegetation and reintroduction of T&E wildlife would enhance wilderness values. The area would be manageable as wilderness.	*Enhanced Wilderness* would preserve 15,272 acres of higher quality wilderness lands. Existing military, livestock and wildlife uses would continue without significant impacts to wilderness values. Opportunities for solitude would be temporarily impacted impacted by ORV use of the river canyons in the eastern part of the WSA not recommended for wilderness. The recommended area would be manageable as wilderness.	*Moderate Wilderness* would preserve 10,192 acres of the WSA in an area surrounding the Gila Box. Impacts to solitude, caused by ORV use, would continue in the river canyons upstream from the confluence of the Gila River and Eagle Creek. Other resource uses would continue in the area recommended for wilderness without significant impacts to wilderness values. The recommended area would be manageable as wilderness.	Same as the *Proposed Action.*
Acres Given Wilderness Protection	0	17,831	15,272	10,192	0
MINERALS AND ENERGY	There would be no significant impact to mineral or energy development under any alternative.				
Mining Claims	0	29	29	29	0
Acres Under Oil and Gas Leases	0	0	0	0	0

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

GILA BOX (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
LIVESTOCK GRAZING	There would be no significant impact to livestock grazing under any alternative.				
RECREATION	ORV use would continue in the river canyons (about 1,000 RVDs per year) and cause conflicts with hiking and backpacking but not floatboaters. Nonmotorized uses would increase to about 2,500 RVDs per year. ORV use would impact opportunities for solitude but no permanent impacts would occur. Reestablishment of riparian vegetation would improve opportunities for hunting and wildlife viewing.	ORV use would be prohibited, eliminating about 1,000 RVDs per year and the impacts to solitude they cause. Primitive recreation uses would be enhanced and would increase to about 3,500 RVDs per year. Existing resource uses would continue without significant impacts to wilderness values.	Same as *All Wilderness* except that 500 RVDs of ORV use per year would be eliminated from the Gila and San Francisco Rivers' confluence downstream. In the area not recommended, impacts would be the same as the *Proposed Action.*	Same as *All Wilderness* except that 500 RVDs of ORV use per year would be eliminated from the confluence of the Gila River and Eagle Creek downstream. In the area not recommended, impacts would be the same as the *Proposed Action.*	Same as the *Proposed Action.*
Miles of Vehicle Ways Closed	0	18	11	8	0
Acres Closed to ORV Use	0	17,831	15,272	10,192	0
WILD AND SCENIC RIVERS	Nondesignation would not significantly impact the wild and scenic river values. Continuation of existing land uses would not impact the eligibility of the river segment for inclusion in the NWSRS. Reestablishment of riparian vegetation would improve river values.	*All Wilderness* would preserve the values that make the 15-mile river segment eligible for inclusion into the NWSRS. ORV use would be eliminated improving wild and scenic river values. Reestablishment of riparian vegetation would improve river values.	*Enhanced Wilderness* would would preserve 11 miles of the Gila River through wilderness management. Impacts to river values in the area recommended for wilderness would be the same as *All Wilderness.* Impacts to river values in the area not recommended would be the same as the *Proposed Action.*	*Moderate Wilderness* would preserve 8 miles of the Gila River through wilderness management with impacts the same as *All Wilderness.* In the area not recommended, impacts would be the same as the *Proposed Action.*	Same as the *Proposed Action.*
Miles of River Protected	0	15	11	8	0
WILDLIFE	Reestablishment of riparian vegetation would enhance wildlife. Continued noise from ORV use in the river canyons would have a low impact on wildlife.	Same as the *Proposed Action* except ORV use would be prohibited, eliminating that impact to wildlife. Wilderness designation would generally benefit wildlife and their habitat.	Same as the *Proposed Action* except ORV use would be prohibited downstream of the Gila and San Francisco Rivers' confluence, eliminating the noise impact to wildlife. Upstream of the confluence, ORV use would	Same as the *Proposed Action* except ORV use would be prohibited downstream of the Gila River and Eagle Creek confluence, eliminating the noise impact to wildlife. Upstream, ORV use would continue with the same	Same as the *Proposed Action.*

			continue with the same impacts to wildlife as *Proposed Action*. Wilderness designation would generally benefit wildlife and their habitat.	impacts to wildlife as the *Proposed Action*. Wilderness designation would generally benefit wildlife and their habitat.	
THREATENED AND ENDANGERED WILDLIFE	Riparian rehabilitation efforts and reintroduction of woundfin and desert bighorn sheep would benefit T&E wildlife. Existing ORV and and livestock uses would result in a low impact to T&E wildlife.	Same as the *Proposed Action* except ORV use would be prohibited. As a result, the noise and presence of vehicles would not disrupt T&E wildlife.	Same as the *Proposed Action* except ORV use would be prohibited downstream of the Gila and San Francisco Rivers' confluence, eliminating the impact of noise on T&E wildlife.	Same as the *Proposed Action* except ORV use would be prohibited downstream of the Gila River and Eagle Creek confluence, eliminating the impact of noise on T&E wildlife.	Same as the *Proposed Action*.
CULTURAL RESOURCES	There would be no significant impact to cultural resources under any alternative.				
VISUAL RESOURCES	The Gila and San Francisco River canyons (15,667 acres) would retain their VRM Class I designation preserving scenic quality. The remainder of the WSA would return to its previous VRM Class IV status offering less protection of scenic values. No significant impacts to scenic quality, however, would occur.	The entire area recommended for wilderness (17,831 acres) would be managed as a VRM Class I area, preserving scenic quality.	The area recommended for for wilderness (15,272 acres) and the river canyons in the area not recommended would be managed as VRM Class I areas, preserving scenic values.	The area recommended for wilderness (10,912 acres) and the river canyons in the area not recommended would be managed as VRM Class I areas, preserving scenic values.	Same as the *Proposed Action*.
Acres Changed to VRM Class I Management	0	2,164	1,684	1,024	0
ECONOMIC CONDITIONS	Nondesignation would not impact expenditures generated by ORV use.	*All Wilderness* would potentially reduce the local sales attributable to ORV use by $15,000. Use, however, would shift to other nearby areas reducing the overall impact to something less than $15,000. Increased wilderness uses would generate local sales further reducing the impact of lost ORV sales.	Same as *All Wilderness* except that potential lost revenue generated by ORV use would total $7,500.	Same as *All Wilderness* except that potential lost revenue generated by ORV use would total $7,500.	Same as the *Proposed Action*.
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

TURTLE MOUNTAIN

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
WATER QUALITY	There would be no significant impact to water quality. Existing livestock and ORV uses and a request for access to the State in holding would not significantly impact water quality. Exclosures would improve riparian habitat reducing erosion and improving water quality.	Same as the *Proposed Action* except ORV use would not be allowed, eliminating that impact to water quality and one exclosure fence would not be built, eliminating that benefit to water quality.	The impacts to water quality would be the same as *Proposed Action* except ORV use only be allowed to continue in the southern part of the WSA not recommended for wilderness. Impacts to water quality, however, would not be significant.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
WATER SUPPLY	There would be no impact to the development of an additional 90,000 gallons of water for livestock grazing on two allotments.	An additional 90,000 gallons of water would not be developed for livestock and wildlife.	Needed sources of livestock water would be constructed in the southern part of the WSA not recommended for wilderness (30,000 gallons). In the water developments (60,000 gallons) would not be built.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
VEGETATION	There would be no adverse impact to vegetation. Livestock and ORV uses would continue without significant impact to vegetation. Construction and maintenance of exclosure fences would improve riparian vegetation.	*All Wilderness* would preserve 17,422 acres of the grama/tobosa shrubsteppe, creosotebush/bursage and Transition PNV types. Livestock use would decrease 299 AUMs to maintain a healthy vegetation condition. A livestock exclosure fence would not be built and vegetation would not benefit.	*Enhanced Wilderness* would preserve 9,104 acres of the grama/tobosa shrubsteppe, creosotebush/bursage and Transition PNV types. Livestock use would decrease 250 AUMs to maintain a healthy vegetation condition. Impacts to riparian vegetation would be the same as *All Wilderness* except the exclosure fence in Hot Springs Canyon would be built enhancing riparian vegetation.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	Nondesignation would result in the permanent loss of natural values throughout the WSA due to construction of livestock facilities. Access to the State in holding would impact natural values and opportunities for solitude if the only reasonable method of access is by vehicle over a road.	*All Wilderness* would preserve the natural values and opportunities for solitude and primitive recreation of all 17,422 acres of the area recommended for wilderness. Planned livestock and wildlife projects would not be built. Access to the State in holding would impact the	*Enhanced Wilderness* would preserve the natural values and opportunities for solitude and primitive recreation on 9,104 acres of the area recommended for wilderness. Wilderness values in the southern part of the WSA not recommended for wilderness would be permanently lost due to	Same as the Proposed Action.	Same as the *Proposed Action.*

		natural values of South Smith Canyon if vehicular access were granted. The northern part of the recommended area would not be manageable as wilderness if vehicle access were granted to the State in holding.	construction of livestock facilities. Access to the State in holding would impair natural values and roadlessness if vehicular access were granted. The northern part of the recommended area would not be manageable as wilderness if vehicle access were granted to the State in holding.		
Acres Given Wilderness Protection	0	17,422	9,104	0	0
MINERALS AND ENERGY	There would be no significant impact to mineral or energy development under any alternative.				
Mining Claims	0	0	0	0	0
Acres With Oil and Gas Leases	0	0	0	0	0
LIVESTOCK GRAZING	There would be no impact to livestock grazing. Livestock distribution, forage utilization and range condition would improve.	*All Wilderness* would decrease livestock use 299 AUMs in the area recommended for wilderness and 660 AUMs in two allotments to improve range condition. Livestock facilities needed to support present numbers would not be built resulting in reduction in livestock use (AUMs).	*Enhanced Wilderness* would decrease livestock use 250 AUMs in the area recommended for wilderness and 447 AUM in the whole allotment to improve range condition. Livestock facilities needed to support present numbers would not be built resulting in reduction in livestock use (AUMs).	Same as the *Proposed Action.*	Same as the *Proposed Action.*
RECREATION	ORV use would continue in the WSA and hikers would continue using the Safford-Morenci Trail. In the next 10 years, total recreation use would increase to about 500 RVDs per year. Existing military uses would have a minimal impact on recreation uses. Livestock and wildlife management projects would improve opportunities for hunting and wildlife viewing. A request for access to the State in holding would impact primitive uses if vehicle access were granted.	*All Wilderness* would eliminate ORV use in the area recommended for wilderness (about 50 RVDs per year). Otherwise, impacts to recreation would be the same as the *Proposed Action.*	Same as *All Wilderness* except that ORV use would continue in the southern part of the WSA not recommended for wilderness.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
Miles of Vehicle Ways Closed	0	4	3	0	0
Acres Closed to ORV Use	0	17,422	9,104	0	0

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

TURTLE MOUNTAIN (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
LAND USE	There would be no impact on a request for access to the State in holding. BLM would provide a reasonable method of access to serve the intended use of the in holding.	*All Wilderness* could adversely impact a request for access to the State in holding but BLM would provide reasonable access.	Same as *All Wilderness*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
WILDLIFE	Overall, wildlife would benefit. Construction of livestock waters and a wildlife water and exclosure would provide additional habitat benefiting wildlife. If road access were granted to the State in holding, wildlife would be temporarily impacted by road construction noise and vehicle use of the road.	*All Wilderness* would have no significant impact to to wildlife. A request for access to the State in holding would result in a temporary disruption of wildlife if road access were provided. Additional livestock and wildlife waters would not be built and wildlife would not benefit from this habitat improvement.	Same as *All Wilderness* except that in the area not recommended for wilderness, construction of livestock waters would provide additional habitat for wildlife.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
THREATENED AND ENDANGERED WILDLIFE	The *Proposed Action* would have no significant impact on T&E wildlife. Existing military, livestock and recreation uses would continue without impacts to T&E wildlife.	Same as the *Proposed Action* except ORV use and livestock facility construction would not be permitted, eliminating impacts of ORV noise and construction disturbance on T&E wildlife.	Same as *All Wilderness* except that ORV use and construction of livestock facilities would be permitted in the southern part of the WSA not recommended for wilderness. These activities would have no significant impact to T&E wildlife.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
CULTURAL RESOURCES	A request for access to the State in holding would be made. If vehicle access over a road were granted as a reasonable means of access, construction and use of the road would adversely impact the historic Safford-Morenci Trail.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
VISUAL RESOURCES	The eastern part of the WSA near Eagle Creek (3,620 acres) would retain its VRM Class I status, preserving scenic values. The remainder of the WSA	The entire area recommended for wilderness (17,422 acres) would be managed as a VRM Class I area, preserving scenic quality.	The area recommended for wilderness (9,104 acres) would be managed as a VRM Class I area, preserving scenic quality. Part of the area not	Same as the *Proposed Action.*	Same as the *Proposed Action.*

	would return to its previous VRM Class IV status, offering less protection of scenic quality.		recommended, along Eagle Creek, would return to its previous VRM Class I status preserving scenic quality. The remainder of the area not recommended would return to its previous VRM Class IV offering less protection of scenic quality.		
Acres Changed To VRM Class I Management	0	13,802	9,104	0	0
ECONOMIC CONDITIONS	There would be no economic impact to livestock grazing.	The stocking rate would be reduced on two allotments (660 AUMs) resulting in an annual earning loss of $3,300 and a ranch value loss of $26,600 and $55,900 respectively. Although impacts to the two allotments would be significant, impacts to the local economy would be slight.	The stocking rate would be reduced on one allotment (447 AUM) resulting in an annual earnings loss of $2,235 and a ranch value loss of $55,900. Although impacts to the allotment are significant, impacts to the local economy would be slight.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				

JAVELINA PEAK

WATER QUALITY	There would be no significant impact to water quality. Existing livestock and ORV uses would continue without significant impact to water quality.	Same as the *Proposed Action* except ORV use would not be allowed eliminating that minimal impact to water quality.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
WATER SUPPLY	There would be no significant impact to water supply under any alternative.				
VEGETATION	There would be no significant impact to vegetation. Livestock grazing would continue without adverse impact to vegetation. ORV use would continue with some damage to mesquite growing on the dunes. The mesquites sprout back and vegetation would not be significantly impacted.	*All Wilderness* would preserve 18,853 acres of the grama/tobosa shrubsteppe PNV type. Livestock grazing would continue without adverse impacts to vegetation. Damage to the mesquite dunes would not occur as ORV use would be prohibited.	*Enhanced Wilderness* would preserve 7,035 acres of the grama/tobosa shrub steppe PNV type with the same impacts as *All Wilderness*. In the area not recommended for wilderness, ORV use would continue with some damage to mesquite growing in the dunes.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
THREATENED AND ENDANGERED PLANTS	The *Proposed Action* would not significantly impact the plants because the plants grow on rock ledges where they would would not be disturbed by continued livestock and ORV uses.	Wilderness management would enhance preservation of T&E plants. Continued livestock and primitive recreation uses would not impact the T&E species. Wilderness management emphasizes natural ecological process	*Enhanced Wilderness* would have the same impact to T&E plants as *All Wilderness*. In the area not recommended, continued ORV use would not impact the T&E species because use does not occur where the plants grow.	Same as the *Proposed Action.*	Same as the *Proposed Action.*

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

JAVELINA PEAK (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
		with no human interference that would adversely impact T&E plants.			
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	None of the WSA would be recommended for wilderness and natural qualities would show increasing signs of ORV use. Military and ORV uses would continue with temporary impacts to solitude caused by noise of ORVs and overflights.	*All Wilderness* would preserve the natural values and outstanding opportunities for solitude and primitive recreation on all 18,853 acres of the area recommended for wilderness. Unauthorized ORV use would temporarily impact opportunities for solitude and the southern part of the recommended area would not be manageable as wilderness. No impacts would occur from continued livestock and wildlife management activities. Military overflights would temporarily impact solitude.	*Enhanced Wilderness* would preserve natural values and outstanding opportunities for solitude and primitive recreation on 7,035 acres. *Enhanced Wilderness* would preserve higher quality wilderness lands as the areas used and impacted by ORVs would not be recommended for wilderness. The natural qualities of the 11,818 acres not recommended would show increasing signs of ORV use.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
Acres Given Wilderness Protection	0	18,853	7,035	0	0
MINERALS AND ENERGY	There would be no significant impact to mineral or energy development under any alternative.				
Mining Claims	0	0	0	0	0
Acres With Oil and Gas Lease	0	0	0	0	0
LIVESTOCK GRAZING	There would be no significant impact to livestock grazing under any alternative.				
RECREATION	The *Proposed Action* would allow current uses to continue and opportunities for primitive recreation would be impacted by the ORV use. ORV use would increase 1,000 RVDs to 2,500 RVDs per year in the next 10 years. Maintenance of livestock and wildlife waters would improve	*All Wilderness* would prohibit ORV use of the dunes and lowlands in the western part of the area recommended for wilderness. The result would be the loss of 1,500 RVDs per year. Wilderness uses like hiking and back-packing would increase to 300 RVDs	Same as *All Wilderness* except that ORV use would continue in the area not recommended for wilderness. In the recommended area, primitive recreation would be enhanced.	Same as the *Proposed Action.*	Same as the *Proposed Action.*

	opportunities for hunting and wildlife observation.	annually over the next 10 years.			
Miles of Vehicle Ways Closed	0	4	0	0	0
Acres Closed to ORV Use	0	18,853	7,035	0	0
WILDLIFE	Continued ORV use of the dunes would have a low to moderate impacts to wildlife. Maintenance of livestock and wildlife water developments would preserve a vital component of wildlife habitat, benefiting wildlife.	Wilderness designation would generally benefit wildlife and their habitat. Impacts to wildlife would be the same as the *Proposed Action* except ORV use would not be allowed eliminating the disruption of wildlife caused by engine noise.	Wilderness designation would generally benefit wildlife and their habitat. Impacts to wildlife would be the same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
THREATENED AND ENDANGERED WILDLIFE	Under the *Proposed Action* there would be no resource uses that would significantly impact T&E wildlife. Military overflights would disrupt T&E species but flights are conducted at high altitudes and impacts would not be significant.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
CULTURAL RESOURCES	There would be no significant impact to cultural resources under any alternative.				
PALEONTOLOGICAL RESOURCES	ORV use of the dunes would continue. Because previous discoveries of fossils occurred outside the dunes, no significant impact would occur. If ORVs begin using the badlands adjacent to the dunes, impacts to fossils may occur.	There would be no adverse impact to fossils because ORV use would be prohibited. Wilderness management would enhance preservation of fossil sites.	Same as *All Wilderness* because most of the badlands (where fossils occur) would be protected by wilderness.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
VISUAL RESOURCES	The mountainous part of the WSA (9,520 acres) would retain its VRM Class I status, preserving scenic quality. The remainder of the WSA would return to VRM Class IV status offering less protection of scenic values.	The entire area recommended for wilderness (18,853 acres) would be managed as a VRM Class I area, preserving scenic quality.	The area recommended for wilderness (7,035 acres) and the parts of the mountains not recommended for wilderness would be managed as VRM Class I areas, preserving scenic quality. The area not recommended would return to VRM Class IV status offering less protection of scenic values.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
Acres Changed to VRM Class I Management	0	9,333	820	0	0
ECONOMIC CONDITIONS	There would be no significant impact to economic conditions under any alternative.				
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

PELONCILLO MOUNTAINS

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
WATER QUALITY	Continued livestock grazing and a small amount of ORV use would not significantly impact water quality.	Same as the *Proposed Action* except that ORV use would not be allowed eliminating that minimal impact to water quality.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
WATER SUPPLY	There would be no impact to water supply under any alternative.				
VEGETATION	No adverse impacts to vegetation would occur. Continued livestock grazing and ORV use would not significantly impact vegetation.	*All Wilderness* would preserve 12,317 acres of oak-juniper woodland PNV type. The on-going livestock grazing would not significantly impact vegetation.	*Enhanced Wilderness* would preserve 10,418 acres of oak-juniper woodland PNV type with impacts the same as *All Wilderness.* In the area not recommended, ORV use levels are so low there would be no significant impact to vegetation.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	Nondesignation would result in minimal impairment of wilderness values. Planned activities would have smallscale, isolated, impacts on the natural qualities of the WSA. Continued ORV use would temporarily impact solitude.	*All Wilderness* would preserve the natural values and opportunities for solitude and primitive recreation of all 12,317 acres of the area recommended for wilderness. Irregular land ownership patterns would result in adverse impacts to wilderness values if incompatible adjacent land uses occurred. The recommended area cannot be managed as wilderness because long-term preservation of wilderness values cannot be ensured with the irregular land ownership pattern. No impact to wilderness values would occur from	*Enhanced Wilderness* would preserve 10,418 acres of higher quality wilderness lands, excluding areas impacted by the noise of ORVs. The irregular land ownership pattern would result in adverse impacts to wilderness values as described in *All Wilderness.* Continued livestock and wildlife management activities would not significantly impact wilderness values.	Same as the *Proposed Action.*	Same as the *Proposed Action.*

		continued livestock and wildlife management activities.			
Acres Given Wilderness Protection	0	12,317	10,418	0	0
MINERALS AND ENERGY	There would be no significant impact to mineral or energy development under any alternative.				
Mining Claims	0	0	0	0	0
Acres Under Oil and Gas Leases	0	300	0	0	0
LIVESTOCK GRAZING	There would be no significant impact to livestock grazing under any alternative.				
RECREATION	The *Proposed Action* would not impact existing uses. Limited ORV travel, rock-hounding and hunting would continue, increasing to about 500 RVDs per year in the next 10 years. Wilderness recreation opportunities would continue in this remote WSA. Construction and maintenance of livestock and wildlife waters would enhance opportunities for hunting and wildlife observation.	*All Wilderness* would have little impact on existing uses. ORV use would be prohibited, eliminating 50 RVDs per year. Opportunities for primitive recreation would be enhanced.	Same *All Wilderness* except ORV use would continue on vehicle ways.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
Miles of Vehicle Ways Closed	0	1½	0	0	0
Area Closed to ORV Use	0	12,317	10,418	0	0
WILDLIFE	Construction of two livestock waters and maintenance of existing wildlife and livestock water developments would enhance wildlife habitat and populations. Release of desert bighorn sheep would help expand their range.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
THREATENED AND ENDANGERED WILDLIFE	Under the *Proposed Action*, the bighorn sheep release and wildlife water developments would improve T&E wildlife habitat and populations. Continued livestock and ORV uses would not significantly impact T&E species.	Same as the *Proposed Action* except ORV use would not be allowed, eliminating this minimal impact to bighorn sheep.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
CULTURAL RESOURCES	There would be no significant impact to cultural resources under any alternative.				

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

PELONCILLO MOUNTAINS (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
VISUAL RESOURCES	The mountainous part of the WSA (5,600 acres) would retain its VRM Class I status, preserving scenic quality. The remainder of the WSA would return to its previous VRM Class IV status, offering less preservation of scenic quality.	The entire area recommended for wilderness (12,317 acres) would be managed as a VRM Class I area, preserving scenic quality.	The area recommended for wilderness (10,418 acres) would be managed as a VRM Class I area, preserving scenic quality. The remaining 1,899 acres would return to its previous VRM Class IV status offering less protection of scenic quality.	Same as the *Proposed Action.*	Same as the *Proposed Action.*
Acres Changed to VRM Class I Management	0	6,717	5,038	0	0
ECONOMIC CONDITIONS	There would be no significant impact to economic conditions under any alternative.				
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				
			DOS CABEZAS MOUNTAINS		
WATER QUALITY	Mining operations in Buckeye Canyon west of the area recommended for wilderness would result in increased sediment load during periods of streamflow. Through mitigating measures in the mining plan of operations, impacts to water quality would not be significant Impacts from ORV use would not be significant.	Same as the *Proposed Action* except the mining operation would occur in the area recommended for wilderness and ORV use would be prohibited, eliminating that impact to water quality.	Same as *All Wilderness.*	Same as the *Proposed Action.*	Same as the *Proposed Action* except ORV use would also continue on vehicle ways in Happy Camp and Howell Canyons. Impacts to water quality, however, would not be significant.
WATER SUPPLY	There would be no impact to water supply under any alternative.				
VEGETATION	The *Proposed Action* would preserve 11,998 acres of oak-juniper woodland and grama/tobosa shrubsteppe PNV types. Continued livestock grazing would not significantly impact vegetation. In the area not recommended, ORV use would continue on existing roads and ways causing no	*All Wilderness* would preserve 18,509 acres of oak-juniper and grama/tobosa shrubsteppe PNV types. Impacts would be the same as the *Proposed Action* except ORV use would be prohibited and the mine in Buckeye Canyon would occur in the area	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Livestock grazing and ORV use would continue in the WSA with no significant impacts to vegetation. Mining in Buckeye Canyon would remove in 115 acres of vegetation.

	significant impact to vegetation. Mining in Buckeye Canyon would remove 115 acres of vegetation.	recommended for wilderness.			
AIR QUALITY	There would be no significant impact to air quality under any alternative.				
WILDERNESS VALUES	The *Proposed Action* would preserve the natural values and opportunities for solitude and primirecreation on 11,998 acres of the area recommended for wilderness. Adverse impacts from continued ORV, livestock, military and wildlife uses would not occur. The recommended area would be manageable as wilderness. In Buckeye Canyon, the area not recommended, development of a mine would permanently impair the natural values of 115 acres of the WSA.	*All Wilderness* would preserve the natural values and opportunities for solitude and primitive recreation on all 18,509 acres of the area recommended for wilderness. Continued livestock, military and wildlife uses would not adversely impact wilderness values. ORV use would not be allowed, eliminating that impact to solitude. The western part of the recommended area would not be manageable as wilderness because of mineral development. This would permanently disturb the natural values on 115 acres of the recommended area.	*Enhanced Wilderness* would preserve the natural values and opportunities for solitude and primitive recreation on 14,555 acres of the area recommended for wilderness. Impacts to wilderness values would be essentially the same as *All Wilderness*. The difference would be that the mining development would occur on lands not recommended for wilderness.	Same as the *Proposed Action.*	Nondesignation would result in the permanent impairment of natural values in the western part of the WSA (Buckeye Canyon) due to mineral development. The remainder of the WSA would not be significantly impacted by continued livestock, wildlife or military uses.
Acres Given Wilderness Protection	11,998	18,509	14,555	11,998	0
MINERALS AND ENERGY	There would be no significant impact to mineral and energy development in the area recommended for wilderness. In the area not recommended, development of the Buckeye and Apache mines would not be impacted by wilderness management.	There would be no impact on mineral and energy development because mineral development would still occur in Buckeye Canyon. This operation would continue because valid existing rights would have been established.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	There would be no impact on minerals and energy development. Future prospecting, exploration and development would proceed unaffected by wilderness management.
Mining Claims	24	134	17	24	0
Acres With Oil and Gas Leases	995	1,026	1,026	995	0
LIVESTOCK GRAZING	There would be no significant impact to livestock grazing under any alternative.				
RECREATION	The *Proposed Action* would prohibit ORV use in Happy Camp and Howell Canyons eliminating about 100 RVDs per year. Primitive recreation opportunities would be enhanced and increase to 1,000 RVDs per year over the next 10 years. Military overflights would temporarily impact opportunities for solitude.	Same as the *Proposed Action* except ORV use would not be allowed in the entire area recommended for wilderness, eliminating about 100 RVDs per year. Also, mining in Buckeye Canyon would adversely impact wilderness recreation opportunities.	Same as the *Proposed Action* except ORV use would also be prohibited in Wood and Sheep Canyons.	Same as the *Proposed Action.*	Nondesignation would not affect existing hunting and ORV uses. While *No Wilderness (No Action)* does not emphasize primitive recreation opportunities, they would still be available.

TABLE 2-3 (continued)
SUMMARY OF IMPACTS

Bureau of Land Management
Safford District, Arizona

DOS CABEZAS MOUNTAINS (continued)

Resource	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness (No Action)
	Maintenance of wildlife and livestock waters would enhance opportunities for hunting and wildlife observation. Mining in Buckeye Canyon would adversely impact recreation opportunities.				
Miles of Vehicle Ways Closed	2½	3½	3½	2½	0
Area Closed to ORV Travel	11,998	18,509	14,555	11,998	0
WILDLIFE	Wilderness designation would generally benefit wildlife and their habitat. The *Proposed Action* would have no impact on wildlife in the area recommended for wilderness. Exclusion of ORVs and maintenance of existing livestock and wildlife waters would improve habitat and benefit wildlife. Low-level, military over-flights would temporarily disrupt wildlife. In the area not recommended, the mining operation would eliminate 115 acres of habitat and displace wildlife.	Same as the *Proposed Action* except the mining operation in Buckeye Canyon would take place in the area recommended for wilderness.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	*No Wilderness (No Action)* would have no significant impact on wildlife except in Buckeye Canyon where a mine would eliminate 115 acres of habitat and displace wildlife.
THREATENED AND ENDANGERED WILDLIFE	In the area recommended for wilderness, there would be no significant impact to T&E wildlife. Military overflights would temporarily disrupt the peregrine falcon. In Buckeye Canyon (an area not recommended), development of a mine would disrupt the peregrine, causing it to leave the area.	Same as the *Proposed Action* except the impacts to T&E wildlife caused by mining in Buckeye Canyon would occur in the area recommended for wilderness.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*
CULTURAL RESOURCES	Development of the Buckeye and Apache Mines would significantly impact the historic values of these old mining sites.	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*	Same as the *Proposed Action.*

	Modern mining technology and road building would impact the old mine sites and the pack trail leading from the Buckeye Mine.				
VISUAL RESOURCES	The area recommended for wilderness (11,998 acres) would be managed as a VRM Class I area, preserving scenic values. The area not recommended would return to its previous Class IV status offering less protection of scenic values. A small area along the Rough Mountains (about 300 acres) would retain its previous Class I status, preserving scenic quality. Development of the Buckeye and Apache Mines would impact scenic quality in Buckeye Canyon.	The entire area recommended for wilderness (18,509 acres) would be managed as a VRM Class I area, preserving scenic values. Development of the Buckeye and Apache Mines would impact scenic values in Buckeye Canyon.	The area recommended for wilderness (14,555 acres) would be managed as a VRM Class I area, preserving scenic values. The area not recommended would return to its previous Class IV status, offering less protection of scenic values. A small area along the Rough Mountains (about 640 acres) would retain its VRM Class I status protecting scenic values. Development of the Buckeye and Apache Mines would impact scenic values in Buckeye Canyon.	Same as the *Proposed Action.*	Mountainous parts of the WSA around the Rough Mountain and Howell Canyon and around Government Peak and Ninemile Creek (5,822 acres) would retain their VRM Class I status, preserving scenic quality. The Happy Camp Canyon drainage would remain a Class III area offering some protection of scenic quality. The remainder of the WSA would return to its previous VRM Class IV status, offering less preservation of scenic values. Development of the Buckeye and Apache Mines would impact scenic values in Buckeye Canyon.
Acres Changed to VRM Class I Management	6,099	12,687	9,373	6,099	0
ECONOMIC CONDITIONS	There would be no significant impact to economic conditions under any alternative.				
SOCIAL ELEMENTS	There would be no significant impact to population or public attitudes under any alternative.				

Source: Safford District Files.

Chapter 3

AFFECTED ENVIRONMENT

CHAPTER 3

AFFECTED ENVIRONMENT

INTRODUCTION

Chapter 3 describes resources that may be impacted by the alternatives, including the *Proposed Action*. Descriptions are as detailed as necessary to present the WSAs' resources that would be affected by implementation of the alternatives. Where impacts to resources would be slight or nonexistent, descriptions are brief or omitted.

More detailed descriptions of the resources of the WSAs and of regional socio-economic conditions appear in other Safford District planning documents. Copies of these documents may be reviewed in the Safford District Office, Safford, Arizona.

TOPOGRAPHY

The EIS area lies within the Basin and Range physiographic province south of the Colorado Plateau. The area's northwesterly trending mountain ranges reach elevations of nearly 8,000 feet and are separated by broad flat or gently sloping basins. The Gila Mountains and the mountainous area near Clifton represent the transition zone between the Colorado Plateau and the Basin and Range provinces. The WSAs are in several distinct physiographic units, including the Gila and San Simon Valleys and the Peloncillo, Dos Cabezas, Gila, Santa Teresa and Mescal Mountains.

WATER

Parts of the three perennial streams (Mescal Creek and the Gila and San Francisco Rivers), 105 springs, 66 reservoirs, two wells, three catchments and four storage tanks are in the WSAs (See Appendix No. 1, List of Water Sources by WSA). The entire EIS area is drained by the Gila River except for a small area on the south side of the Dos Cabezas Mountains from which water flows into Willcox Playa. The EIS area is also drained by many intermittent streams which flow mainly after heavy rains. The Army Corps of Engineers and the Bureau of Reclamation are jointly studying the Upper Gila River Basin in Arizona and New Mexico for flood control and water supply needs. The Camelsback Dam, authorized for construction in 1962, is one measure being considered for flood control and water supply purposes. The damsite is in the Gila Box WSA.

There is currently no regular monitoring of water quality in any of the WSAs. A limited amount of water quality data has been collected at a few locations. Water quality at springs and wells is generally considered suitable for human contact and consumption unless livestock have access to the source. Water in the perennial streams is not suitable for human consumption but is generally usable for human contact. Most of the reservoirs are used as livestock waters and are not suitable for either human contact or consumption. The Bureau of Water Quality Control, Arizona Department of Health Services, has tested the Gila and San Francisco Rivers both upstream and downstream of the Gila Box WSA for impairment of state water quality standards from mining-related activities. Water quality standards have occasionally been exceeded (ADHS 1984).

A plan was prepared in September 1985 by BLM to monitor toxic or hazardous pollutants on federal lands as well as future occurrences from mining or dumping of hazardous materials. This plan is in effect only for the public lands in the Safford District.

CLIMATE

Climatic conditions in the WSAs are similar to those throughout the region. Alternating lowlands and mountains create abrupt climatic changes over short distances. Higher elevations have cooler temperatures and more precipitation than valleys. Summer days are hot (around 100°F) but usually not unbearable. Average minimum winter temperatures in the higher elevations fall below freezing, and snow is common. Winters in the valley are relatively mild. Annual precipitation averages 7 to 16 inches in the valleys and 15 to 30 inches in the mountains, with most rainfall in the late summer. Drought is most common from April to June and less severe in the fall. Long, severe droughts occur irregularly and usually last two to five years.

AIR

Air quality over the WSAs is generally good and the ambient air quality is rated Class II by the State of Arizona. Class II standards allow for moderate deterioration of air quality associated with moderate, well-controlled industrial and population growth. Portions of three WSAs, however, are in sulphur dioxide non-attainment areas—the eastern parts of Gila Box and Turtle Mountain WSAs near the Morenci copper smelter and the southwestern part of Needle's Eye WSA is near the Hayden-Winkelman copper smelters.

Odors from the Morenci smelter can be noticed in the Gila Box and Turtle Mountain WSAs. Exhaust fumes from jet airplanes can occasionally be noticed in some of the WSAs after low-level flights.

VEGETATION

The Bailey-Kuchler vegetation classification system uses elevation, rainfall and temperature to describe potential natural vegetation. All WSAs in this EIS are within the Mexican Highlands Shrubsteppe province, with part of the Turtle Mountain WSA in the Upper Gila Mountains Forest province. Table 3-1 shows acres of vegetation types by WSA and Table 3-2 describes the vegetation types.

No federally-listed threatened or endangered plants have been found in any of the WSAs. One listed species (Table 3-3), however, may be in the Needle's Eye WSA and another species under review may be in Needle's Eye and Javelina Peak WSAs. Plants listed by the State of Arizona and those listed for review by Fish and Wildlife Service are placed in the sensitive category by BLM. BLM policy gives sensitive plants the same management protection as federally listed plants.

NOISE

The U.S. Air Force (USAF) and Arizona Air National Guard (ANG) conduct high- and low-level training flights over most of the WSAs. These flights originate from Luke, Williams and Davis-Monthan Air Force Bases and the ANG base at Tucson International Airport. A flight includes one or more aircraft and typically lasts for one to two minutes over a WSA. Low-level flights are flown from 500 to 1,500 feet above ground level (AGL). Higher level flights are flown from 5,000 to 51,000 feet AGL. Table 3-4 details flight data by WSA.

Noise from the Phelps Dodge mining operation at Morenci, including explosions, trucks, trains and mine equipment, can be heard from parts of the Gila Box and Turtle Mountain WSAs. Off-road vehicles (ORV) using the Gila and San Francisco River canyons in the Gila Box WSA can also be noisy. The number of vehicle visits total about 175 over a seven-month period (May to November) each year.

WILDERNESS VALUES

Characteristics. During the wilderness inventory, BLM specialists determined that all the WSAs in the EIS area met the basic wilderness criteria. All exceed 5,000 acres, are primarily natural and offer outstanding opportunities for solitude or primitive recreation. Many of the WSAs also have special features that contribute to their wilderness values.

Balancing the Geographic Distribution of Wilderness. The geographic distribution of wilderness was analyzed by state (Arizona and New Mexico) and a region encompassing parts of both states. The region has Nogales, Arizona on the southwest corner; Flagstaff, Arizona on the northwest corner; Albuquerque, New Mexico on the northeast corner and El Paso, Texas on the southeast corner. Interstate highways and the international border define the boundaries of this region.

Designated wildernesses are well distributed within Arizona, New Mexico and the region. Within the State of Arizona there are 48 existing wildernesses (mostly Forest Service, but also BLM and National Park Service) and five administratively endorsed wildernesses (FS, NPS and Fish and Wildlife Service). As of August 1985 there are 88 areas under wilderness study, mostly BLM. The geographic distribution of these wildernesses is spread evenly throughout the state, with the exception of the Navajo and Hopi Indian Reservations in northeastern Arizona.

Within the State of New Mexico there are 22 existing wildernesses administered primarily by the FS (BLM, FWS and NPS also), no administratively endorsed areas and, as of August 1985, 59 areas under wilderness study, most of them BLM areas. The wildernesses are distributed evenly throughout central and western New Mexico.

TABLE 3-1
WSA ACRES BY VEGETATION TYPES

Bureau of Land Management
Safford District, Arizona

WSA	Oak-Juniper Woodland	Transition	Creosotebush/ Bursage	Grama/Tobosa Shrubsteppe
Needle's Eye	—	—	9,716	—
Black Rock	—	—	—	8,492
Fishhooks	—	15,215	—	—
Day Mine	—	17,309	—	—
Gila Box	—	—	14,361	3,470
Turtle Mountain	—	5,422	2,500	9,500
Javelina Peak	—	—	—	18,853
Peloncillo Mountains	12,317	—	—	—
Dos Cabezas Mountains	12,874	—	—	5,635

Source: Safford District Files

TABLE 3-2
WSA Vegetation Types

Bureau of Land Management
Safford District, Arizona

Type and WSA	Occurrence	Features	Dominant Species	Other Components	Representation in NWPS*
Oak—Juniper Woodland Type No. 27 Peloncillo Mountains and Dos Cabezas Mountains WSAs	Western Texas, southern Arizona, New Mexico	Low open-to-dense forest of broad-leaf and needle-leaf evergreen trees and varying understory	Alligator juniper, one-seed juniper, Emory oak, Mexican blue oak	Manzanita, sideoats grama, blue grama, hairy grama, sotol, ceanothus, silk-tassel, beargrass, Mexican pinyon, gray oak, silver-leaf oak, shrub live oak, Mearns sumac, littleleaf sumac, Lowell ash, narrow-leaf hoptree	Vegetation type occurs in two designated wilderness areas (47,000 acres), four administratively endorsed areas and and 17 acres under study. The vegetation type is well represented and has excellent opportunities for expanded representation from the endorsed areas.
Transition (between Oak-Juniper Woodland and Mountain Mahogany — Oak Shrub Vegetation) **Type No. 28** Fishhooks, Day Mine and Turtle Mountain WSAs	Arizona	Low open-to-dense forest to broadleaf and needleleaf evergreen mahogany understory in transition with dense-to-open deciduous or semi-deciduous shrubs	Alligator juniper, one-seed juniper, Emory oak, Mexican blue oak, mountain mahogany	Manzanita, sideoats grama, sotol, ceanothus, silktassel, beargrass, Mexican leaf oak, shrub live oak, Mearns sumac, Lowell ash, narrowleaf hoptree, bigtooth maple, Apache plume, skunkbush sumac, snowberry	No existing or administratively endorsed wilderness areas represent this vegetation type and only three WSAs under study, all in the Safford District, could represent it.
Creosotebush/Bursage Type No. 36 Needle's Eye, Gila Box and Turtle Mountain WSAs	Southeast California, southern Arizona	Open stand of shrubs and dwarf shrubs	Creosotebush	Catclaw acacia, blue paloverde, barrel cactus, ocotillo, wolfberry, purple prickly pear cactus, mesquite, desert zinnia, wooly paperflower	Vegetation type occurs in no designated wilderness areas, one administratively endorsed area (43,000 acres) and four WSAs.
Grama/Tobosa Shrubsteppe, Type No. 52 Black Rock, Gila Box, Turtle Mountain, Javelina Peak, Dos Cabezas Mountains WSAs	Southeast Arizona, southern New Mexico	Short grasses with shrubs varying from very open to dense	Black grama, tobosa, creosotebush, tarbush	Whitethorn, threeawn, desert marigold, sideoats grama, broom snakeweed, bush muhly, prickly pear, cactus, cholla cactus, mesquite, alkali-sacaton, sand dropseed, banana yucca, soaptree yucca, black grama, fourwing saltbush, catclaw acacia, Mormon tea, beargrass, ocotillo, mariola	Vegetation type in no existing or administratively endorsed wilderness areas but 22 areas under study in Arizona and New Mexico offer a broad opportunity to represent this vegetation type.

*National Wilderness Preservation System
Source: Kuchler, 1964

TABLE 3-3
THREATENED AND ENDANGERED PLANTS

Bureau of Land Management
Safford District, Arizona

Scientific Name	Common Name	FWS Listed Species	FWS Review Species	WSAs Involved
Cereus greggii	nightblooming cereus		P	Needle's Eye, Javelina Peak
Echinocereus triglochidiatus var. *arizonicus*	Arizona hedgehog	P		Needle's Eye

P — Possible
Source: Safford District Files

Within the region there are 32 existing wildernesses, one endorsed area and 46 areas under wilderness study. The wildernesses are administered primarily by the FS, with BLM administering most of the areas under study. Wildernesses are distributed evenly throughout the region.

TABLE 3-4
AIRCRAFT OVERFLIGHTS*

Bureau of Land Management
Safford District, Arizona

WSA	Approx. Number of Flights	Level	Flight Source
Needle's Eye	1,300	low	USAF
Black Rock	450	high	USAF
Fishhooks	450	low	USAF
Day Mine	450	low	USAF
Gila Box	unknown**	low and high	ANG
Turtle Mountain	unknown**	low and high	ANG
Javelina Peak	unknown**	low and high	ANG
Peloncillo Mountains	0	—	—
Dos Cabezas Mountains	245	low	USAF

* For calendar year 1983.

** In 1982, ANG flew 5,186 sorties during 2,016 weekday, daylight hours in the Morenci Military Operations Area, which includes these three WSAs. Specific information on number of flights over the WSAs is not known.

Source: Personal and written communications with the Air Force and Air National Guard.

Solitude or Primitive Recreation Opportunities. The WSAs in this EIS are within a day's driving time (5 hours) of three standard metropolitan statistical areas (SMAS) as defined by the Bureau of the Census—Phoenix and Tucson, Arizona and El Paso, Texas. Many designated and endorsed wildernesses are within a day's driving time of all three SMSAs.

As of August 1985 there were 51 designated wildernesses within 250 miles (5-hour drive) of Phoenix, administered by the USFS, NPS and BLM. There are also five areas (FWS and USFS) administratively endorsed for wilderness and 124 areas (mostly BLM, but also USFS and NPS) undergoing wilderness study.

Within 250 miles of Tucson, there are 43 designated wildernesses (mostly USFS, but also NPS and BLM). In addition, there are five areas (FWS and USFS) administratively endorsed for wilderness and 85 areas (mostly BLM, with some FWS and USFS) undergoing wilderness study.

There are 25 designated wildernesses within 250 miles of El Paso (USFS, NPS and FWS). There is one area (USFS) administratively endorsed for wilderness and 50 areas (mostly BLM, with some USFS and NPS) undergoing wilderness study.

Ecosystem Diversity. The interrelationships of vegetation, topography and wildlife form the basis for evaluating ecosystem diversity. The Bailey-Kuchler vegetation classification system (Kuchler and Bailey 1978) was used to determine vegetation types. In addition, geographical and ecological associations can be drawn from the information within this classification system. Vegetation, topography and wildlife are more fully discussed in those sections of this chapter and in the following narratives on wilderness values.

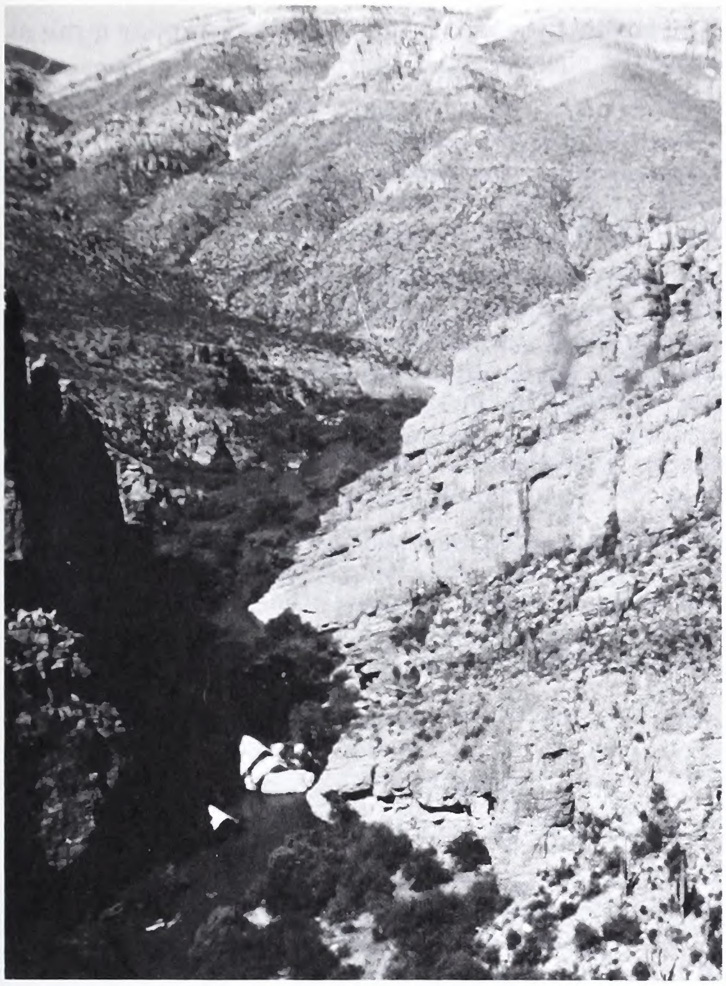
Wilderness in the Local Region. The local region includes all of Cochise, Graham and Greenlee Counties, eastern Pinal County, and southern Gila County in Arizona, and western Grant and Hidalgo Counties in New Mexico. This region has seven designated wildernesses and one administratively endorsed wilderness (Table 3-5).

Description of Wilderness Study Areas

NEEDLE'S EYE

AZ-040-1A, 9,716 acres (Map 21)

In Needle's Eye WSA the Gila River flows through a steep-walled canyon into which several side canyons enter. The river canyon is bounded on the north by the rugged Mescal Mountains and on the south by the San Carlos Apache Indian Reservation. WSA elevation ranges from 2,300 feet to 4,300 feet.



In one of many sites of rugged beauty in Needle's Eye WSA, the limestone strata of the Mescal Mountains dip steeply to the Gila River to form the narrow passage known as Needle's Eye.

TABLE 3-5
EXISTING AND ADMINISTRATIVELY ENDORSED LOCAL WILDERNESSES*

Bureau of Land Management
Safford District, Arizona

Status	Name of Area	Administering Agency	Acres
Designated	Aravaipa Canyon	BLM	6,699
	Bear Wallow	FS	11,080
	Chiricahua	FS	87,700
	Chiricahua National Monument	NPS	10,290
	Galiuro	FS	76,317
	Miller Peak	FS	20,190
	Santa Teresa	FS	26,780
	Total — 7 areas		239,056
Endorsed	Blue Range	FS	163,388
	Total — 1 area		163,388

* As of August 1985
Source: Safford District Files

Most of the WSA is covered by desert shrub vegetation including paloverde, saguaro and barrel cactus, catclaw acacia and jojoba. Riparian vegetation along the Gila River and Mescal Creek includes mesquite, Fremont cottonwood, Arizona sycamore, velvet ash, willow and saltcedar.

The 9,716 acres in the Needle's Eye WSA are in essentially natural condition. Human imprints include 5¼ miles of fences, 7.2 miles of powerline, three developed springs, two corrals, a line cabin, wildlife exclosures, 2.7 miles of vehicle ways and a silted-in dirt reservoir. The range facilities and associated developments are largely unnoticeable and do not impair naturalness. The powerline and ways have minimal impact on naturalness.

A 44-kv (kilovolt) powerline runs east-west through the center of the WSA. Built in 1928 with materials brought in by pack animal, the powerline's rusty towers blend in well with the surrounding landscape. The powerline is patrolled by helicopter or horseback and only slightly influences naturalness because no more than one or two towers are visible at any one time, few of the towers are skylined and the powerline has no access roads.

Two vehicle ways are in the WSA. The first is in the WSA's northeast and access is from the Reservation to the north or the road along the Gila River to the south. The other vehicle way parallels Mescal Creek for 1.7 miles and is used only occasionally on a short portion at its northern end. The remainder of this way is badly deteriorated and unusable.

Few outside human imprints or activities affect the WSA. Pierson's Ranch on Mescal Creek, Coolidge Dam, Christmas Mine and the roads on the eastern and western boundaries can be seen from a few isolated areas within the WSA but are mostly well screened from view by the WSA's rough topography.

There are outstanding opportunities for solitude throughout the WSA because of its isolated location and topographic and vegetation screening. The WSA's long and narrow configuration is offset by the ruggedness of the Mescal Mountains. Mescal Creek, Dick Spring Canyon, their tributaries and other side canyons of the Gila River provide numerous places for visitors to find seclusion. The area's solitude is enhanced by extensive undeveloped portions of the San Carlos Indian Reservation on the WSA's north and south sides. Views out of the WSA into the Reservation create a sense of increased remoteness.

The diversity of landforms provides visitors with a variety of experiences and challenges. Outstanding opportunities for recreation in the WSA include hiking, backpacking, horseback riding, rock climbing, hunting, camping, birdwatching, photography and sightseeing.

Scenic values and wildlife enhance the WSA's wilderness values. Steeply tilted rock layers, sharp clifflines and the deeply cut canyon of the Gila River are outstanding scenic features. The cliffs and riparian habitat provide important nesting sites for raptors, including several sensitive species. Bald eagles, a federally-listed endangered species, winter in the WSA.

BLACK ROCK

AZ-040-8, 8,492 acres (Map 22)

Black Rock WSA is dominated by the steep foothills of the Santa Teresa Mountains from which numerous canyons and washes drain, predominantly northward. Elevations range from 3,400 feet to a high point of 5,892 on Jackson Mountain.

The WSA's vegetation includes desert shrub, mountain shrub, grassland and riparian vegetation types. Common plants include whitethorn, snakeweed, cholla and prickly pear cactus, juniper, scrub oak, Arizona sycamore, Arizona walnut, velvet ash and various grasses.

The 8,492 acres of Black Rock WSA are natural. Human imprints include 9 miles of fences, a 2-mile pipeline and two troughs, six small dirt dams, one cement dam, three developed springs, and 1 mile of a vehicle way. These imprints are small, scattered throughout the area and screened by vegetation or topography, thus have little impact on naturalness. In the lower foothills on the northeast side of Jackson Mountain, a mining road roughly parallels the WSA boundary for a mile. Approved under the Interim Management Policy, this road branches off a cherrystem road, is not visible from most of the WSA and only impacts a small area.

Outside human imprints and activities have little impact on the WSA. Visible from limited viewpoints in the WSA are the Dryden, Glover and Pace ranches with their buildings, improvements and fields and the fluorspar mine at the end of the cherrystem road.

The WSA's size, shape, topographic screening and isolated location provide outstanding opportunities for solitude throughout. This WSA is enhanced on the south boundary by the Santa Teresa Wilderness in the contiguous Coronado National Forest.

Black Rock WSA also offers outstanding opportunities for primitive recreation, including hiking, backpacking, horseback riding, hunting, rock climbing, bird watching, photography and sightseeing. The summit of Jackson Mountain offers wide vistas of the Safford Valley and the Gila, Santa Teresa, Galiuro and Pinaleno Mountains. Recreation activities are further enhanced by the opportunity to continue them in the Santa Teresa Wilderness.

Wildlife and a scenic feature add to the WSA's wilderness values. Black Rock, a volcanic plug in the WSA's northwest, is a highly scenic feature visible for many miles. Its steep walls rise almost 900 feet from its base and provide a nest site for eagles.

FISHHOOKS

AZ-040-14, 15,215 acres (Map 23)

Lying in the rugged Gila Mountains, Fishhooks WSA is an area of numerous steep and narrow canyons. Elevations

Water seasonally flows through Black Rock Canyon in Black Rock WSA.

range from 4,000 feet to a high point of 6,629 feet on Gila Peak. Many canyons and washes drain southwesterly toward the Gila River.

Mountain shrub, pinyon-juniper and desert shrub vegetation types in the WSA include common species such as juniper, snakeweed, turpentine bush, Emory oak, singleleaf pinyon, jojoba, whitethorn and prickly pear cactus.

The 15,215 acres of the Fishhooks WSA are highly natural. Human imprints include about 11 miles of fence, 3½ miles of vehicle ways, four dirt dams, two rock dams, two water catchments, a developed spring, five livestock exclosures and a corral. These imprints, all well screened by vegetation and the extremely rugged topography, have only slight and localized impacts on naturalness.

Topographic and vegetative screening and a sense of remoteness contribute to the outstanding opportunities for solitude throughout the WSA. In spite of the WSA's long and narrow shape, the rugged topography and canyons offer numerous secluded spots, particularly in Fishhooks, Sam, Steer Springs and Dutch Pasture Canyons.

Fishhooks WSA offers outstanding opportunities for hiking, backpacking, horseback riding, hunting, rock climbing, birdwatching, photography and sightseeing. This area is the most rugged portion of the Gila Mountains and has highly scenic views and interesting geologic features.

Gila Peak, seen in the background across portions of the Fishhooks Canyons, is the highest point in Fishhooks WSA.

Numerous special features enhance wilderness values in Fishhooks WSA. The Gila Mountains' cliffs, peaks and canyons are highly scenic and the cliffs are also valuable nesting habitat for raptors. There is riparian habitat important to wildlife in Sam Canyon and parts of the Fishhook Canyons. The watersheds of Upper and Middle Fishhook Canyons have two plant communities near climax condition. The canyons support a broadleaf riparian woodland and a stand of Lowell ash, probably the best examples of these vegetation communities in the Gila Mountains. Such areas are valuable for assessing potential vegetation production in the Gila Mountains. In addition, this WSA may have the highest cultural resource significance in the Safford District (see Cultural Resources, Chapter 3).

DAY MINE

AZ-040-16, 17,309 acres (Map 24)

Day Mine WSA includes part of the rugged Gila Mountains, along with steep foothills, canyons and washes. From a high point of 6,444 feet on Hilonsum Peak in the WSA's north, the terrain drops to 4,000 feet along the southern boundary. Washes flow mainly to the southwest towards the Gila River. The Left Fort of Markham Creek, the eastern boundary of the WSA, has carved an interesting steep-walled narrow canyon.

Mountain shrub, pinyon-juniper and desert shrub vegetation types in this WSA include common species such as juniper, snakeweed, turpentine bush, Emory oak, singleleaf pinyon, jojoba, whitethorn, agave and prickly pear cactus.

Day Mine WSA's 17,309 acres are in a natural condition. Human imprints include seven miles of fences, two pipelines, four dirt dams, two developed springs, five livestock exclosures and a small weather station. These imprints have slight local adverse impacts on the area's naturalness.

The WSA also has seven rarely used ways totaling 4 miles, all in the northern part of the WSA. Five of the ways are short (each 0.2 miles long). The other two ways (1.3 and 1.6 miles long) are more noticeable and are occasionally used by ranchers and hunters. These ways, however, are deteriorating, are screened by topography and vegetation and have a minimal impact on localized areas.

Human imprints and activities outside the WSA have little impact inside the area. The Day Mine line cabin, several range improvements and four short cherrystem roads can be seen from a few isolated areas in the WSA. The cherrystem road to Brushy Tank and its associated corrals and dirt reservoirs moderately impact the naturalness of parts of the WSA's north-central portion, but these impacts are largely screened by the WSA's topography and vegetation.

The area's size, shape, topography and vegetation contribute to outstanding opportunities for solitude throughout the WSA. The cliffs along the southern boundary, the deep canyons throughout the area and the pinyon-juniper forest in the upper elevations of the Gila Mountains offer numerous secluded spots. Long distance views of the Safford Valley and the surrounding mountains from the WSA's high points also add to a sense of isolation and remoteness.

The topography and vegetation of Day Mine WSA offer outstanding opportunities for primitive and unconfined recreation, including hiking, camping, hunting, horseback riding, photography and sightseeing.

The WSA also has important scenic and wildlife values, such as the southern escarpment of the Gila Mountains because of its abrupt elevation change and the subtle coloration of rock formations. The cliffs offer valuable nest sites for raptors, and the Left Fork of Markham Creek provides important riparian habitat.

GILA BOX

AZ-040-22/23/24(A), 17,831 acres (Map 25)

Known for its 1,000-foot deep canyons between the Gila Mountains and the Black Hills, the Gila Box WSA includes 15 miles of the Gila River, 3 miles of the San Francisco River and numerous small canyons. WSA elevations range from a high of 5,800 feet to a low along the Gila River of 3,160 feet. The area's running water, rugged and colorful terrain, highly eroded geologic formations and diversity of plants and animals produce outstanding scenery.

The WSA's grassland, mountain shrub, desert shrub and riparian vegetation types include snakeweed, juniper, evergreen oaks, jojoba, whitethorn, cholla and prickly pear cactus and various grasses. Riparian areas along the rivers support Fremont cottonwood, Goodding willow, Arizona sycamore, Arizona walnut, velvet ash, netleaf hackberry and mesquite.

The Gila Box WSA's 17,831 acres are natural. Only slightly impairing the WSA's naturalness are 9 miles of fences, five developed springs, two pipelines, three corrals, two dirt dams, three storage tanks and troughs, seven short vehicle ways and six historic sites. Many of these imprints lie in the WSA's uplands and near its boundaries.

The six historic sites (see Cultural Resources, Chapter 3), associated with past ranching and homesteading are generally unnoticeable. On the Aragon and Maques sites, however, homesteading attempts along the Gila River are more visible because of more structural remains. These sites are in fairly dense mesquite groves which help to lessen their impact on naturalness.

Several human imprints outside the WSA impact the WSA's naturalness: several boundary roads, three cherrystem roads and outside sights and sounds from the Phelps Dodge mine at Morenci. The roads have a low impact on naturalness due to their infrequent use and topographic and vegetation screening. The cherrystem road to Gillard Hot Springs is 1.5 miles long and receives a small amount of use from hunters and off-road vehicles. Though topography screens this road from most of the

The escarpment in the background divides Day Mine WSA into the Sonoran Desert vegetation type shown above and the pinyon-juniper dominated slopes at the higher elevations.

WSA, the road can be easily seen from a small part of the eastern part of the WSA.

To the north of the WSA is the Phelps Dodge Corporation's mine and smelter at Morenci which emits smoke, odors and noise that occasionally can be noticed in parts of the WSA. The mine, smelter and tailings pond dikes can be seen primarily from the uplands in the eastern portion of the WSA but these outside influences have little affect on the rest of the WSA.

Opportunities for solitude are outstanding throughout most of the WSA. The rugged topography with its numerous canyons offers many opportunities for isolation and solitude, which are enhanced by the area's large size and natural condition. Such opportunities, however, are less than outstanding along Gillard Hot Springs Road and the Gila and San Francisco Rivers when vehicles are present and can be seen and heard by visitors to the WSA.

Gila Box WSA offers many opportunities for primitive recreation. The rivers, canyons, plants and animals all combine to provide outstanding hiking, backpacking, seasonal floatboating and canoeing, camping, photography and sightseeing. The WSA also offers good opportunities for hunting, fishing, rock climbing, horseback riding and birdwatching.

Several special features enhance the WSA's wilderness values. The perennial Gila and San Francisco Rivers flow for a combined length of 18 miles through the WSA. The 'last free-flowing stretch of the Gila River in Arizona' is a title given to this portion of the Gila. The natural qualities of the Gila Box have made this stretch of the river a an increasingly popular floatboating and canoeing area. Riparian vegetation, uncommon in the southwestern United States, greatly enhances wildlife habitat in the WSA. The Gila Box is well known for its population of wintering bald eagles. In addition, there are many outstanding scenic areas with steep cliffs, colorful bluffs, deep canyons, a volcanic plug and excellent examples of geologic erosion. Ten prehistoric and six historic sites have been recorded in the WSA. Three prehistoric and two historic sites qualify for listing on the *National Register of Historic Places*.

Numerous side canyons cut through volcanic formations leading to the Gila River in Gila Box WSA.

TURTLE MOUNTAIN

AZ-040-22/23/24(B), 17,422 acres (Map 26)

Turtle Mountain WSA is dominated by numerous ridges with intervening canyons. Elevations range from 4,400 feet to a high point on Turtle Mountain of 6,635 feet. In the southern part of the WSA, the mountains and hills descend gradually towards the Gila River. Rugged terrain dominates the western part of the WSA as the terrain drops steeply toward Bonita Creek. The northern and eastern parts of the WSA are dissected by rugged canyons, with highly eroded rock formations along Eagle Creek.

The WSA's grassland, mountain shrub, desert shrub and riparian vegetation types include mesquite, snakeweed, juniper, evergreen oaks, jojoba, whitethorn, burroweed and cholla and prickly pear cactus. Common species in the riparian areas include Fremont cottonwood, Goodding willow, Arizona sycamore, Arizona walnut, velvet ash and netleaf hackberry.

Turtle Mountain WSA's 17,422 acres are generally in natural condition. Human imprints include 14 dirt dams, three rock and concrete dams, seven developed springs, three storage tanks, eight miles of pipeline and 10 troughs, two rock and concrete storage tanks, two corrals, 14 miles of fences, livestock exclosures and four vehicle ways totaling 2.8 miles. These imprints are well distributed throughout the WSA and are made largely unnoticeable by topographic screening. The WSA has so many existing imprints, however, that any more projects would create impacts that cumulatively would impair the naturalness of the WSA.

The developed springs, pipelines, corrals and fences have almost no impact on naturalness due to their small size, low profile and the vegetation screening. The dams have a slight impact on naturalness in small, localized areas, but they are mostly well screened by topography and some vegetation. The ways are largely unnoticeable and are returning to a natural condition. Many segments of these ways have been washed out, other segments are revegetating. Future natural processes will further deteriorate the remnants.

Human imprints and activities outside the WSA do not significantly diminish the WSA's wilderness character. Several nearby range facilities and some boundary roads can be seen in a few localized areas in the WSA, but they have only a slight impact on naturalness.

The major outside impact comes from Phelps Dodge Corporation's mining operation at Morenci, which includes the copper mine, a smelter, tailings ponds, dikes, pipelines, leaching operations, roads, heavy equipment, railroads and overburden dumps. Topography screens the view of much of the operation from within the WSA. The higher elevations, from which the smelter stacks and the overburden dumps are visible, are farther away from these imprints and less affected by them. Moreover, earth-colored tones of the overburden dumps do not highly contrast with the surrounding landscape, and distance and topography reduce mining sounds within the WSA. At times, usually in the early morning, smelter smoke blows over the WSA. But by midmorning prevailing winds from the west (common during daylight) remove the smoke from

The western flank of Turtle Mountain in Turtle Mountain WSA rises over 3,000 feet from nearby Bonita Creek.

the WSA. Overall, the sights, sounds and odors of the Morenci mining operation do not significantly detract from the WSA's naturalness.

Outstanding opportunities for solitude exist throughout the WSA. The area's large size, shape, topography, and vegetation allow visitors to avoid the sights, sounds and evidence of other people. Many canyons, such as Trujillo, Hot Springs and South Smith Canyons, provide numerous secluded spots.

The size of the WSA and its diversity of topographic features provide visitors with outstanding opportunities for the following primitive recreation activities: hiking, backpacking, camping, horseback riding, hunting, photography and sightseeing.

Wildlife and historic features enhance the WSA's wilderness values. The eastern part of the WSA near Eagle Creek provides important nesting sites for raptors, which often depend on undeveloped areas for such habitat. Several times recently, Rocky Mountain bighorn sheep have been seen in the WSA. The Safford-Morenci Trail, which crosses the northern part of the WSA in South Smith Canyon, has historic significance as an early supply route to the mines at Morenci.

JAVELINA PEAK

AZ-040-48, 18,853 acres (Map 27)

Although much of Javelina Peak WSA consists of gently rolling lowlands, the focal point is the rugged Whitlock Mountain range in the WSA's northeast. These mountains rise abruptly from the San Simon Valley floor and culminate in the rugged, steep-sided 5,592-foot high Javelina Peak. A small area of highly eroded badlands lies at the western base of Javelina Peak. The southern portion of the WSA is dominated by heavily vegetated dunes of potential ecologic significance.

The WSA contains desert shrub, creosotebush and mesquite vegetation types. Common plants include whitethorn, cholla and prickly pear cactus, wolfberry, creosotebush, mesquite, yucca, catclaw, Mormon tea, four-wing saltbush, burroweed and various grasses.

Javelina Peak WSA's 18,853 acres are in a natural condition. Human imprints include 10 miles of fences, two rock and concrete dams, three dirt dams, a series of eight rock and concrete dams with seven small silt trap dams, three old road construction borrow areas, two wildlife water developments, and an ORV use area. Most of these imprints have little impact on naturalness.

Four miles of vehicle ways in the WSA's northwest branch off of the powerline boundary road. Bladed many years ago, these ways are now faint. Numerous sections have been washed out, and most of the remnants are slowly revegetating and returning to a natural condition.

Part of a 4,000-acre dune area lies within the WSA's southern portion. The dunes receive yearlong ORV use, but most use occurs outside the WSA. Evidence of use consists of vehicle tracks and some damage to vegetation.

Several human imprints outside the WSA impact portions of the WSA, including boundary roads, a powerline, corrals and a cherrystem road to a stock tank.

About half of the WSA boundary is formed by roads. Haekel Road on the western boundary receives much use that is visible from the WSA's southwestern quarter. Badger Den Well Road, on the eastern boundary, receives minimal use and is screened by topography from all but isolated portions of the WSA.

A little-used cherrystem road branching off Haekel Road extends 1.5 miles into the WSA to KMP Tank. Because it is highly visible in the nearby WSA flatlands, this road and any vehicles on it impact the naturalness of the surrounding area.

Parts of the northwestern boundary are formed by the access road for a 345-kv powerline. Portions of the powerline and road are visible from the northwestern third of the WSA, but topographic screening limits most of the impacts to small portions of the WSA.

Human imprints along the boundaries impair the area's naturalness, but the WSA's large size, along with topographic and vegetation screening, lessen or eliminate most of the influence of these imprints. The most severe impacts, ORV use and motor vehicles on boundary roads, are along the WSA's boundaries, especially to the west.

The size, shape and topography of Javelina Peak WSA provide outstanding opportunities for solitude. Several canyons in the Whitlock Mountains, rolling hills and highly eroded badlands at the base of these mountains and numerous lowland washes combine to offer opportunities for isolation. The high points in the WSA offer excellent views of the surrounding undeveloped countryside and add to the feeling of isolation. Only near the boundary roads, especially Haekel Road, do the opportunities lessen or disappear.

Javelina Peak WSA offers outstanding opportunities for such primitive recreation as hiking, horseback riding, rock collecting, rock scrambling, camping, photography and sightseeing. Topographic diversity greatly enhances many of these activities.

Scenic, geologic, ecologic and paleontological features enhance the WSA's wilderness values. The Whitlock Mountains have excellent scenic values and Javelina Peak

The badlands in the south of Javelina Peak WSA offer desert visitors a variety of interesting features.

is an interesting geologic feature. The dunes in the WSA's southern portion may be of ecologic significance. The WSA has two areas with fossil resources but their significance has not been identified. The fossils in the Whitlock Hills are extensive, and there is a high potential for more discoveries within the WSA.

PELONCILLO MOUNTAINS

AZ-040-60, 12,317 acres (Map 28)

Peloncillo Mountains WSA lies in the most rugged part of the Peloncillo Mountains. The main features of the WSA are steep mountains, cliffs and numerous canyons with gentle hills and flatlands in the eastern part of the WSA.

This WSA's mountain shrub, grassland, desert shrub and creosotebush vegetation types include mesquite, snakeweed, burroweed, various grasses, turpentine bush, juniper, Emory oak, creosotebush, catclaw, whitethorn, agave and prickly pear cactus.

The WSA's 12,317 acres are natural. Human imprints include eight dams (dirt or concrete and rock); two pipeline systems (about 1 mile); four small storages; two pipelines (about 2½ miles); a developed spring and a rock and concrete storage; two small rock and concrete dams, a pipeline, a diversion dike and a dirt dam; 15 miles of fence; and two wildlife water developments. These imprints have little impact on the area's naturalness.

Two vehicle ways in Little Doubtful Canyon branch off the cherrystem road in the canyon bottom. Another way is in the rolling hills of the eastern part of the WSA. These ways receive a small amount of use from ranchers and hunters, but are not highly visible due to vegetation screening and have a low impact on the area's naturalness.

Human imprints and activities outside the WSA slightly impair naturalness, with two short cherrystem roads the major impact. Little Doubtful Canyon Road extends one mile into the WSA, leading to a dirt dam. It is primarily used by a rancher but also by hunters. A half-mile long road enters the WSA from the west and leads to two small concrete dams. This road receives little use except by the rancher. Neither of these roads are highly visible and topographic screening allows neither to greatly detract from naturalness. Vehicles in Little Doubtful Canyon, however, can be highly visible from surrounding ridges and can affect the canyon's apparent naturalness.

Throughout most of the WSA, rugged topography and numerous canyons offer outstanding opportunities for solitude. In two areas, however, such opportunities are less than outstanding. Near the road on the WSA's southeastern boundary the terrain is much flatter, and vehicles can be seen and heard. Vehicles also impair or eliminate opportunities for solitude in Little Doubtful Canyon, but travel is infrequent and the road appears to be returning to a natural condition through lack of use.

Peloncillo Mountains WSA offers outstanding opportunities for primitive recreation, including hiking, backpacking, rock scrambling, hunting and sightseeing. The higher country offers long distance views and excellent scenery enhances wilderness values in the rugged mountains and canyons.

DOS CABEZAS MOUNTAINS
(formerly Happy Camp Canyon), AZ-040-65, 18,509 acres (Map 29)

The WSA lies in the rugged Dos Cabezas Mountains and includes several peaks over 7,500 feet with a high point of 7,950 feet on Cooper Peak. Numerous canyons wind their way among these peaks. The dramatic terrain of the western and central portions of the WSA changes to rolling hills along the eastern boundary as the elevation drops to 4,080 feet. The northeastern slope of Government Peak is a large, highly scenic area strewn with granite outcrops and boulders.

The WSA's mountain shrub, desert shrub and riparian vegetation types include turpentine bush, snakeweed, mountain mahogany, juniper, oak species, mesquite, grasses, agave and prickly pear cactus. Common riparian species include Arizona sycamore, Fremont cottonwood, velvet ash and Arizona walnut.

The 18,509 acres in the Dos Cabezas Mountains WSA are natural. Human imprints include 18 miles of fences, 12 developed springs, a well, three vehicle ways totaling 2.8 miles, two old cabins, several old mines, three wildlife water developments, one livestock exclosure and the foundations of several old houses. These imprints have minimal impact on the WSA's naturalness.

The vehicle ways lie in the upper Buckeye Canyon (0.5 miles), upper Wood Canyon (0.3 miles), and in Happy Camp and Howell Canyons (2 miles). The Buckeye Canyon and Wood Canyon ways appear to have not been recently used and are both highly deteriorated, revegetating and returning to a natural state. They moderately impair the naturalness of the canyons through which they pass, but topography screens them from most of the WSA. The way in Happy Camp and Howell Canyons is old, faint and heavily vegetated and only slightly impairs naturalness.

The wood cabins in Happy Camp and Tar Box Canyons, set in small groves of trees, are occasionally used by hunters and ranchers. Highly weathered and well-screened by vegetation, these cabins have small and localized impacts on naturalness.

Old mines are found in Buckeye and Howell Canyons and on the southwestern slopes of Howard Peak. The Howell Canyon and Howard Peak mines are small, largely unnoticeable, and have a low impact due to vegetation and topographic screening. The Buckeye Canyon mines are

On the southwest side of Happy Camp Canyon WSA the peaks of the Dos Cabezas Mountains exceed 7,500 feet in elevation.

larger and more noticeable with several shafts and tunnels and a moderate impact on naturalness. Topographic screening and their isolated location on the northwestern edge of the WSA, however, make them unnoticeable from most of the WSA.

Several human imprints outside the WSA impact naturalness within small portions of the area. These imprints include boundary roads, cherrystem roads and mines. Most of the western edge of the WSA is bounded by the Elma Mine Road, which has a moderate to severe impact on those small parts of the WSA from which it is visible. Topography, however, screens this road from most of the WSA. The cherrystem road in Wood Canyon, which intrudes a short distance into the WSA, has several old mines and cabins along its length. The impacts are severe, but only within this small, narrow canyon. Topography screens the impacts from most of the WSA. The cherrystem road in lower Happy Camp Canyon leads to a parcel of private land. The road is not highly visible due to excellent vegetation screening. The impacts on naturalness within the WSA are low to moderate. The Apache 12 and Elma Mines are visible from only small portions of the western portion of the WSA and have small, localized impacts on the WSA's naturalness.

Dos Cabezas Mountains WSA, with its rugged topography and numerous canyons, offers many outstanding opportunities for isolation and solitude. Opportunities for solitude are less than outstanding along the western boundary and in lower Happy Camp Canyon. When vehicles are in these areas they can be seen and heard, thus impacting solitude.

The WSA offers many opportunities for primitive recreation. The topography, animals and plants combine to provide outstanding opportunities for hiking, backpacking, camping, rock scrambling and sightseeing. Sightseeing from the higher mountains and ridges offers outstanding long distance views of the Sulphur Springs and San Simon Valleys and numerous mountain ranges. The WSA also offers good opportunities for hunting, horseback riding and photography.

Dos Cabezas Mountains WSA has two special features that enhance the area's wilderness values — numerous riparian areas of high importance to all wildlife in the area and a jumble of highly scenic granite boulders, balanced rocks and rock outcroppings on the northeastern slopes of Government Peak. During wet periods, many pools and waterfalls form among these boulders.

MINERALS AND ENERGY

This section discusses information on minerals and energy for each WSA. Information about minerals and energy was obtained through an inventory prepared by the Arizona Bureau of Geology and Mineral Technology (ABGMT 1982). The inventory consisted of a literature search and data gathering for each WSA. Mineral and energy assessments in this EIS were made from this data. Areas recommended for wilderness will have further mineral surveys conducted on them by the U.S. Geological Survey (USGS) and the Bureau of Mines (USBM) to determine mineral values that may be present. The USGS/USBM study has been completed for the Gila Box and Turtle Mountain WSAs. The USBM's preliminary investigation have been completed for Needle's Eye, Fishhooks, Black Rock and Dos Cabezas Mountains WSAs.

A recent USGS publication (*Geological Survey 1983*) has rated the petroleum potential of wilderness lands in Arizona. The Dos Cabezas Mountains, Black Rock and Needle's Eye WSAs are rated at zero potential. Javelina Peak WSA is rated medium potential and the remaining WSAs are rated low to zero potential.

The lands in the Needle's Eye, Black Rock, Fishhooks, Peloncillo Mountains and Dos Cabezas Mountains WSAs are classified as not prospectively valuable for geothermal resources. Geothermal resources in the other WSAs are discussed by individual WSA.

Table 3-6 and Maps 1 through 9 show mining claim status of each WSA, acres under oil and gas and geothermal leases, as well as potentials for minerals, oil and gas and geothermal energy.

NEEDLE'S EYE

General Geology. Needle's Eye WSA lies at the eastern end of the Mescal Mountains, a northwest trending range that borders the southwest edge of the Colorado Plateau physiographic province. The range forms a monoclinal block with strata dipping 20°-25° southwest and is composed of Precambrian schists, limestones, quartzites, granitic intrusives and diabase dikes; Paleozoic limestones and shales; and Tertiary-Cretaceous volcanic flows and intrusives. All of these rock types outcrop within the WSA. The range is characterized by faulted blocks of Precambrian and Paleozoic sedimentary rocks that have been isolated by intrusive rocks. Two major northwest trending faults and one northeast trending fault transect the WSA.

Minerals. No known economic minerals have been found within the WSA, but several past producers and some current producers were or are active within a few miles. The major nearby producer is the Christmas Mine, five miles southwest of the WSA at the eastern end of the Dripping Springs Mountains. This copper mine lies in the Banner Mining District in ore occurring as replacements in metamorphosed Paleozoic limestones. Other minerals that have produced in the Banner District include gold, silver, lead, zinc, mercury and tungsten.

The Saddle Mountain Mining District lies four miles southwest of the WSA and has produced copper, gold, silver, lead and zinc. Much of the Saddle Mountain District mineralization is in Tertiary-Cretaceous volcanics, chiefly andesite.

The Stanley Butte Mining District, 10 miles southeast of the WSA, has been a producer of gold, silver, iron, copper,

NEEDLE'S EYE 4-1A

Mining Claims/Oil and Gas Leases

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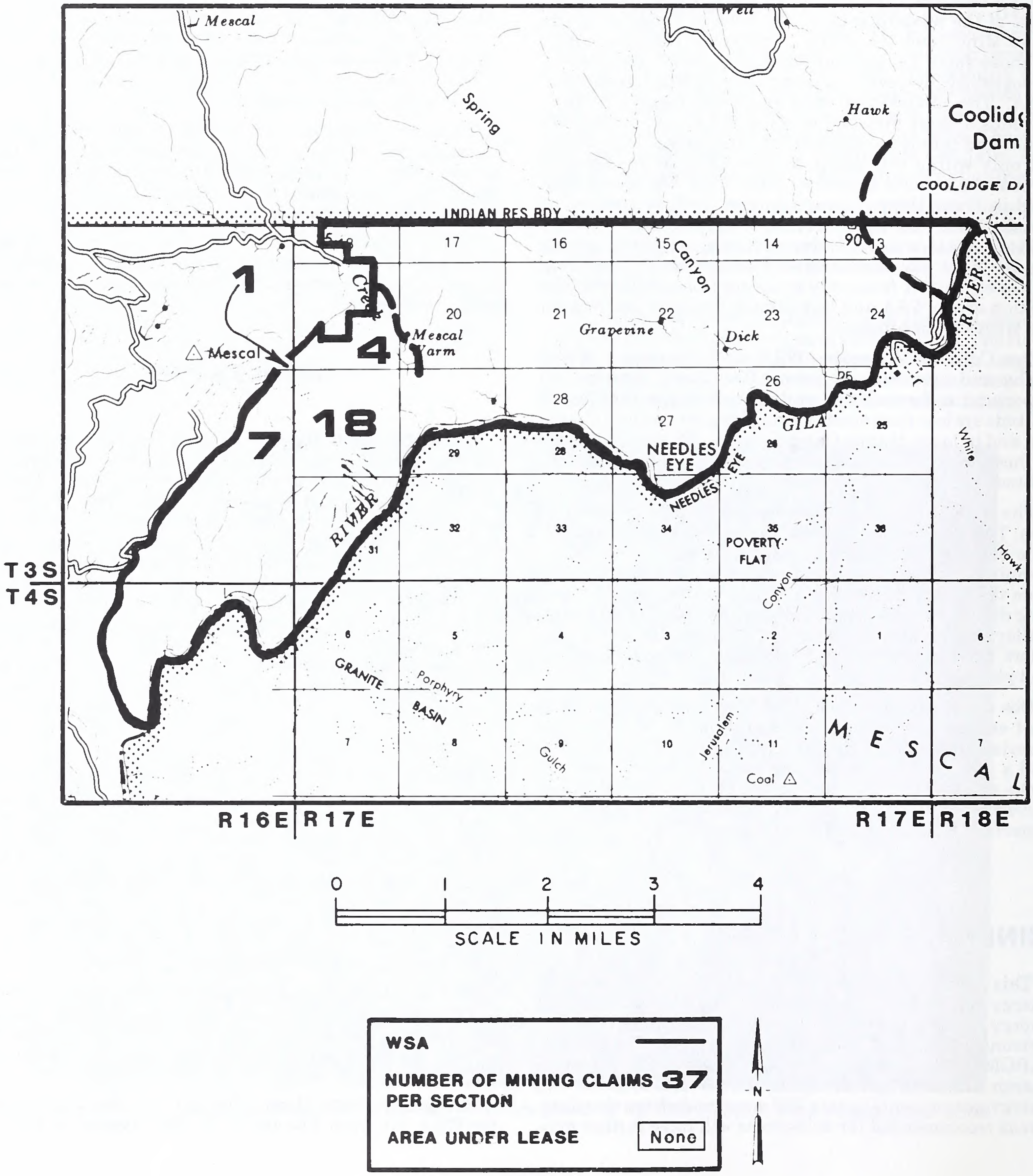


MAP 1

TABLE 3-6
MINERAL STATUS AND POTENTIAL*

Bureau of Land Management
Safford District, Arizona

WSA	Mining Claims**	O&G Lease Acreage	Potential		
			Mineral	O&G	Geo.
Needle's Eye	22	0	low	zero	zero
Black Rock	6	0	low	zero	zero
Fishhooks	36	0	low	low — zero	zero
Day Mine	1	0	low	low — zero	low
Gila Box	29	0	low — med.	low — zero	low
Turtle Mountain	0	0	low — med.	low — zero	low
Javelina Peak	0	0	low	medium	low
Peloncillo Mountains	0	300	low	low — zero	zero
Dos Cabezas Mountains	134	1,026	high	zero	zero

* As of July 1986.

** The number of claims may not equal the total of that shown on Maps 1 through 9 because many claims cross section lines.

Source: Safford District Files.

barite, fluorspar, lead and garnet. Mineralization occurs in Paleozoic limestones and Tertiary-Cretaceous volcanics.

Coal was mined a few miles south of the WSA in the Deer Creek Basin in the early 1900s, but high ash content and thinness of the beds make it economically insignificant. Asbestos is found about eight miles north of the WSA in Precambrian limestone, and the zeolite mineral chabazite three miles west of the WSA. There has been exploratory drilling on several claims to evaluate this deposit.

Uranium has been produced from Precambrian quartzite in the southern Pinal Mountains 12 miles northwest of the WSA. There are several other radioactive deposits in the southern Pinal and northern Mescal ranges, all in Precambrian quartzites. This quartzite also hosts several uranium deposits in the Sierra Ancha region 35 miles north of the WSA.

The recent report of USBM investigations of Needle's Eye WSA concludes that the Laramide intrusives that would provide mineralization are absent, so there is no potential for development, even though rock formations are similar to those found in nearby mining districts. The uranium potential of the WSA is unknown but there are no surface indicators of its occurrence.

No minerals on the National Defense Stockpile Inventory of Strategic and Critical Materials are known to be in the WSA, but copper, lead, zinc and fluorspar (discovered nearby) are included in the inventory and are in short supply.

BLACK ROCK

General Geology. The Jackson Mountain area of the Santa Teresa range has a complex composition of Precambrian metamorphic rocks, consisting chiefly of schists, quartzites, and gneisses of the Pinal Schist Formation. Granitic rock, which forms the main high portions of the Santa Teresas, is part of a Tertiary-Cretaceous batholith that is exposed in the Jackson Mountain vicinity. Tertiary volcanics, consisting of rhyolite-welded ash-flow tuffs, are also exposed. Around the exclosures of rock are weakly to well-indurated conglomerates of Quarternary-Tertiary age. The area is transected by several major northwest trending faults.

Minerals. The only known mineralization within Black Rock WSA is coarsegrained crystalline fluorspar found as fissure vein deposits in a southeast striking fault zone in Precambrian granitic rocks. Other prospects are on Jackson Mountain, but the only production history is for some 1200 tons from the above fluorspar deposit in the 1950s. Some prospect pits a few miles south of the WSA exposed similar fluorspar veins in porphyritic quartz monzonite cut by northeast striking rhyolitic dikes. It has been concluded that this past producer is of possible commercial interest but that more detailed work is needed to determine the amount of ore reserves (ADMR 1975).

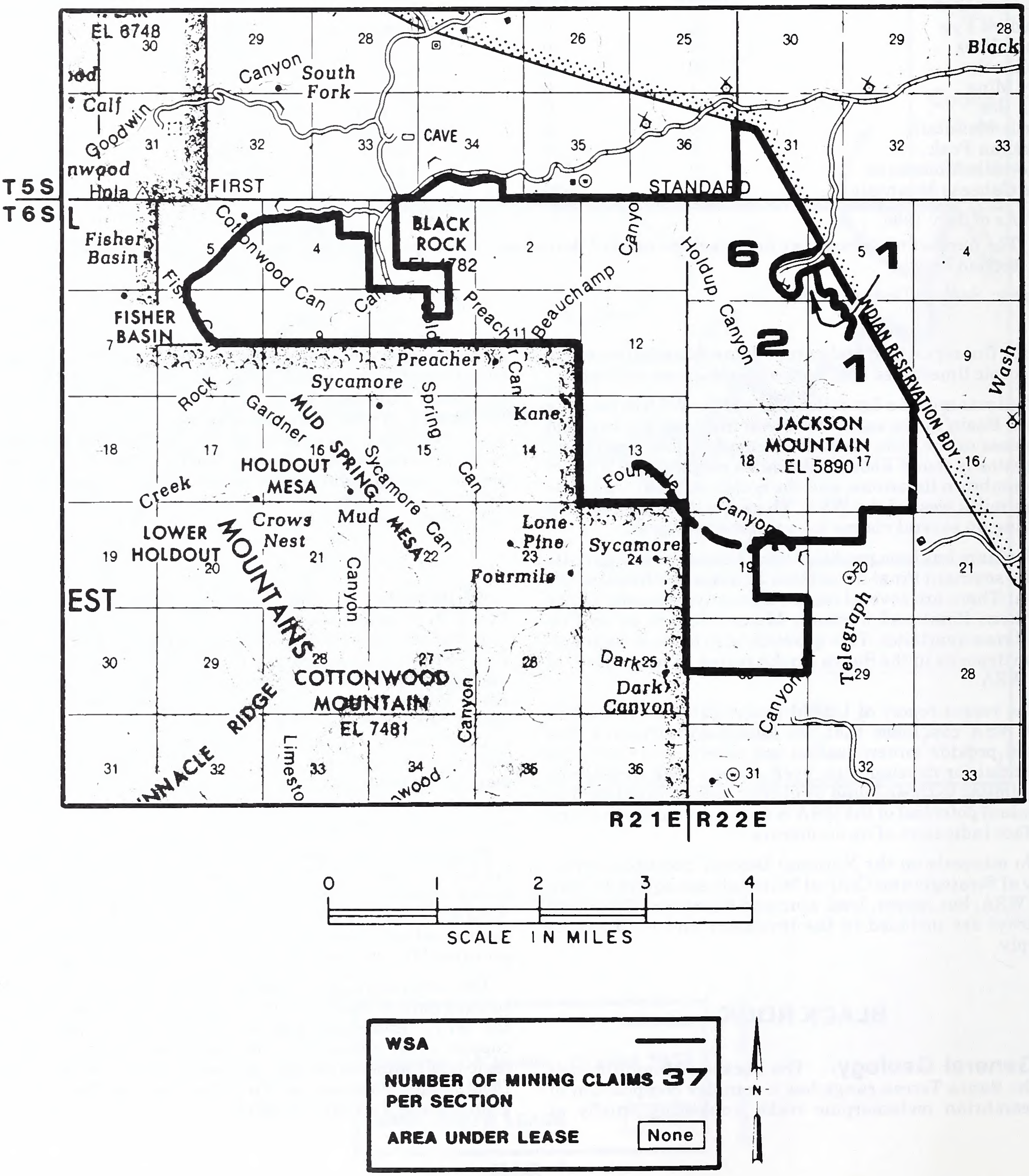
Exploration two miles north of the WSA has found copper mineralization. Other exploration in this same vicinity found iron mineralization and, just outside the WSA's western boundary, copper. Uranium occurrences associated with iron oxides, have been found in small test pits about five miles north and five miles south of the WSA.

The Aravaipa and Stanley Butte Mining Districts include part of the Santa Teresa Mountains to the west of the WSA. These districts have a history of lead, zinc, copper, silver and gold production from a variety of geologic environments, including Precambrian metamorphic formations, Paleozoic sediments, Tertiary-Cretaceous granites and Tertiary volcanics.

BLACK ROCK 4-8

Mining Claims/Oil and Gas Leases

MAY 1986 BASEMAP © ADOT



MAP 2

Potential for mineral production in Black Rock WSA appears to be low. The Cretaceous carbonate beds present in the nearby mining districts are absent within this WSA, so there is no potential for ore deposits. The fluorspar vein is intermittent and considered unlikely to extend far.

Fluorspar is listed on the National Defense Stockpile Inventory of Strategic and Critical Materials and was in low supply as of September 1983 (Federal Emergency Management Agency-FEMA 1983).

FISHHOOKS AND DAY MINE

General Geology. Fishhooks and Day Mine WSAs are in the Gila Mountains of the Highland region of the Basin and Range physiographic province. The Gilas are a northwest trending range composed almost entirely of Tertiary volcanics. The WSAs are mostly intermediate volcanics with some areas of younger basaltic flows and pyroclastics and some Tertiary intrusives. Some Paleozoic limestones and quartzites outcrop a few miles from the WSAs.

Minerals. There are no known economic minerals in either WSA, although copper and manganese are nearby to the west and south. Just west of Fishhooks WSA, there is a copper prospect in mid-Tertiary andesite flows and porphyritic rocks, and a few miles west another copper prospect in a Cambrian quartzite/Devonian-Carboniferous limestone contact. The mineralization is chiefly of malachite. Between these two prospects are two underground prospects in an exposure of Devonian-Carboniferous limestone.

On the south edge of Day Mine WSA, secondary copper minerals are in mid-Tertiary andesite flows and porphyritic rocks. Other copper prospects are in Tertiary volcanics south and east of Day Mine WSA. A manganese prospect just south of Day Mine WSA is in calcite veins in mid-Tertiary porphyritic andesite.

The lack of mineral occurrences within the WSAs and the few occurrences nearby make the potential for production appear low. The Lone Star Mining District, however, lies in the same mountain range to the southeast of the WSAs. Several copper deposits have been discovered in this district, including the Phelps Dodge-Safford and Kennecott-Safford deposits. Both of these contain millions of tons of ore reserves. The San Juan copper mine between the two has already produced more than a million tons of ore. These and other deposits are related to quartz monzonite porphyry stocks, the Lone Star quartz diorite stock, or other Tertiary-Cretaceous plutons that lie under the younger Tertiary volcanics. Similar mineralization could occur under the WSA's Tertiary volcanics. An exploration company has reported an anomaly that extends into the southwestern portion of the Day Mine WSA. Unmapped outcrops of limestone and porphyry intrusives lie near the magnetic anomaly. The data seem to confirm that mineral potential exists within this WSA.

Energy. The Day Mine WSA has approximately 3,600 acres of land classified as prospectively valuable for geothermal resources. These lands are in the southwestern portion of the WSA. Just 6 miles southwest of the WSA, hot springs and water wells have temperature gradients (See Glossary) 164° C/km (327° F/3,281 ft.).

Copper and manganese, found near Fishhooks and Day Mine WSAs, are both on the National Defense Stockpile Inventory of Strategic and Critical Materials. As of September 1983, copper was in short supply, whereas manganese was adequately stockpiled (FEMA 1983).

GILA BOX AND TURTLE MOUNTAIN

General Geology. These WSAs lie on the northern end of the Peloncillo Mountains, a north-south trending fault block range typical of the Basin and Range physiographic province. The WSAs are in the transition zone between the Colorado Plateau province and the Basin province. The area is composed of volcanic and volcaniclastic rocks, ranging from Pleistocene to Oligocene. These flows and pyroclastics are chiefly andesites and basaltic andesites. A major northwest trending fault lies chiefly along the southwestern edge of the WSAs. Several northwest trending faults run along the eastern edge of the WSAs.

Minerals. The only reported mineral occurrence is manganese, found in lenses and short irregular pods in the eastern portion of the Gila Box WSA, and also two miles northeast of the Turtle Mountain WSA in veins running through granitic porphyry. Just to the southwest of the WSAs, the Dorothy B gold placers have been intermittently worked up to the present. The gold is in Quaternary river gravels along the Gila River and Bonita Creek. Just northeast of Gila Box WSA, similar gold placers are found along the San Francisco River and its tributary gulches.

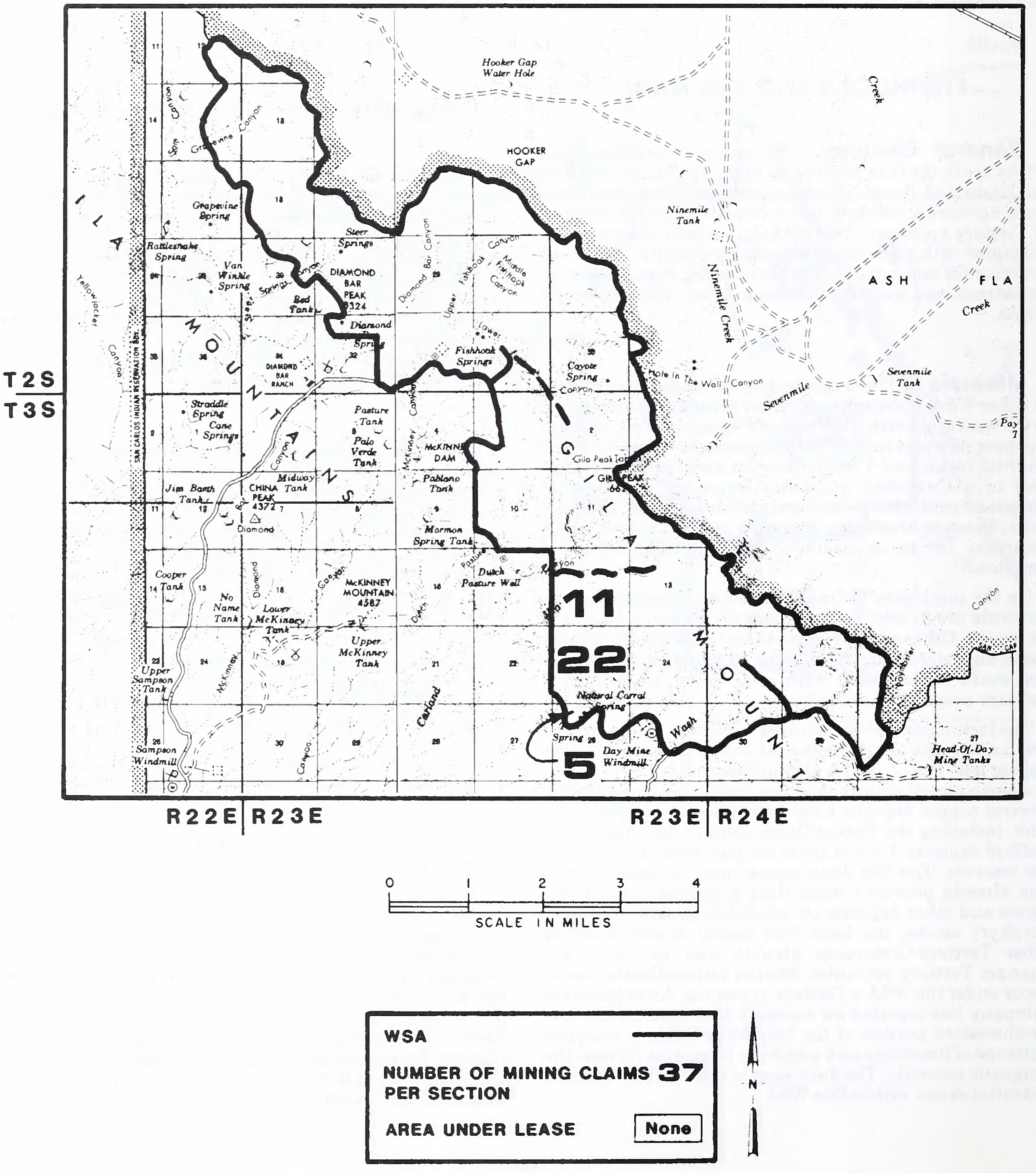
The Morenci Mining District, northeast of the WSAs, is one of the most significant copper producers in the United States. The second largest open pit copper mine in North America lies in an area of supergene enrichment of disseminated pyrite-chalcopyrite protore in a Laramide quartz monzonite intrusive. Mining in the district progressed from small oxidized replacement deposits to enriched sulfide veins to the present porphyry ore. Aside from numerous other copper mines in the district associated with the Laramide intrusives and later diabase dikes, the district has also produced gold and silver in veins cutting Paleozoic limestone and shale.

The Lone Star Mining District is in the Gila Mountains a few miles west of Gila Box and Turtle Mountain WSAs. Several large porphyry copper deposits have been discovered in this district. Millions of tons of ore are identified at the Kennecott, Phelps Dodge, San Juan and Inspiration properties. The copper deposits are associated with Tertiary-Cretaceous granodiorite and quartz monzonite plutons. Several areas of copper mineralization are west of Gila Box WSA in fissure veins within Tertiary-Cretaceous andesites and basalts.

FISHHOOKS 4-14

Mining Claims/Oil and Gas Leases

MAY 1986 BASEMAP © ADOT

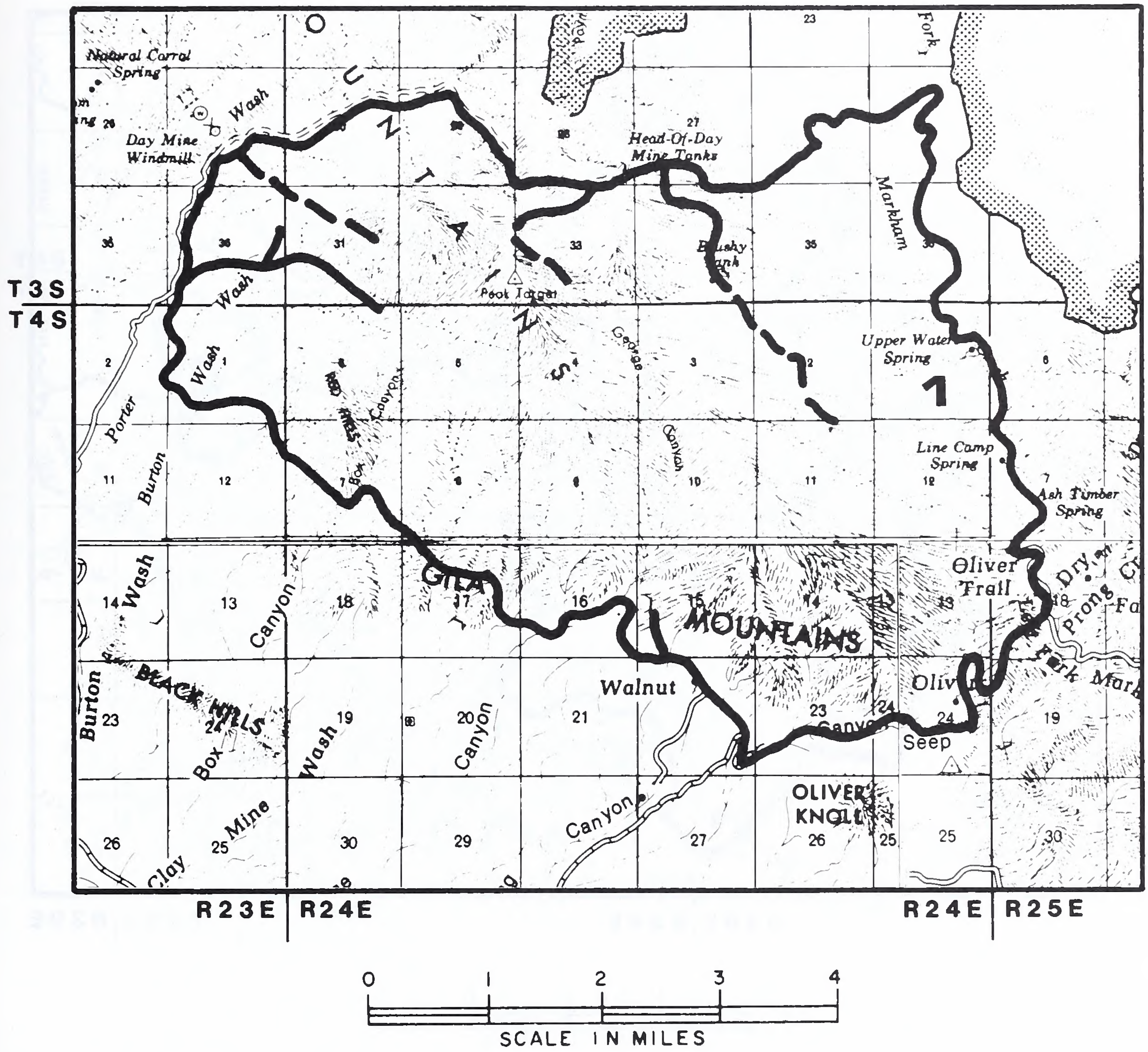


MAP 3

DAY MINE 4-16

Mining Claims/Oil and Gas Leases

MAY 1986 BASEMAP © ADOT



WSA

NUMBER OF MINING CLAIMS PER SECTION 37

AREA UNDER LEASE None

N

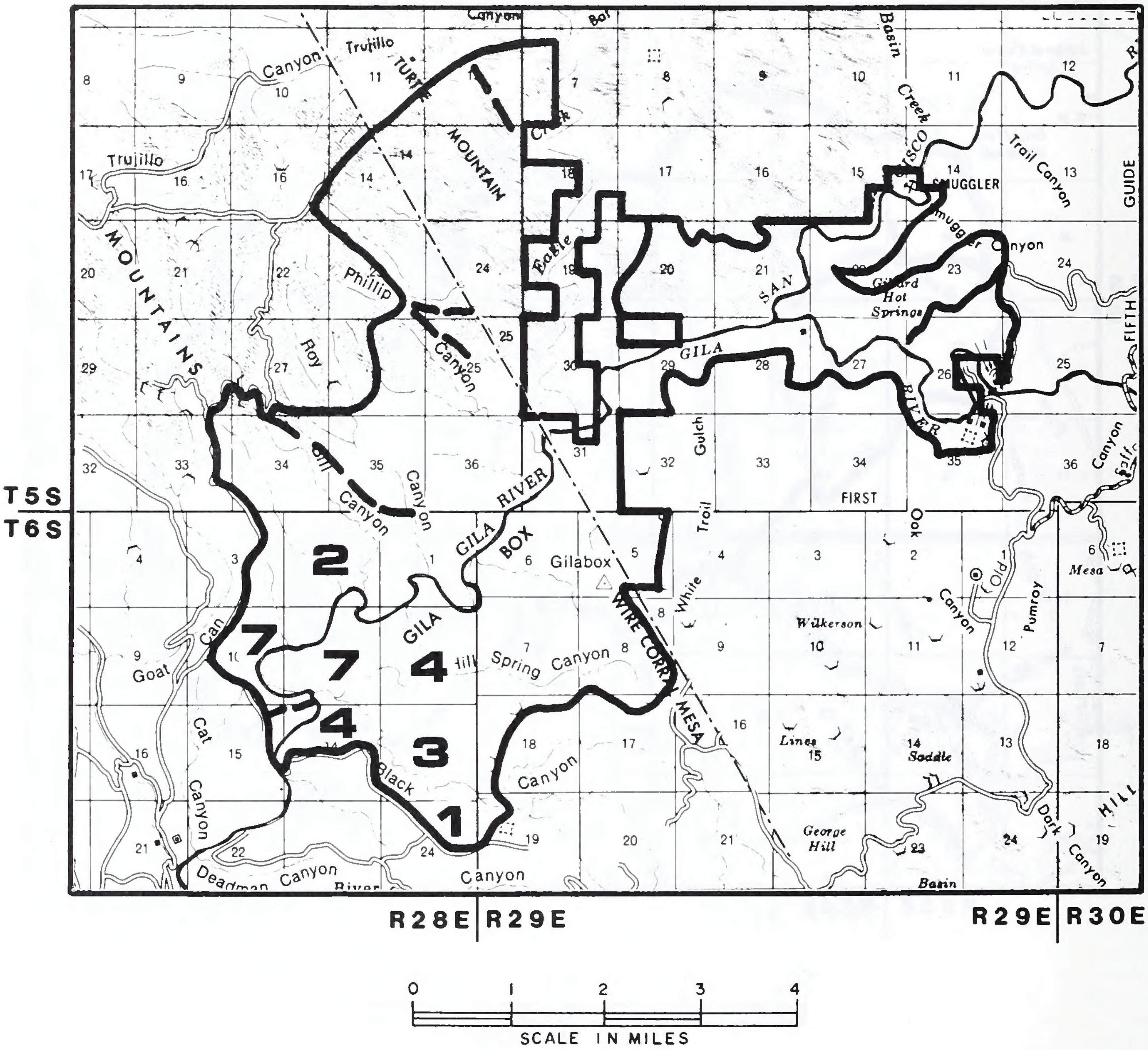
MAP 4

GILA BOX 4-22/23/24 (A)

Mining Claims/Oil and Gas Leases

MAY 1986

BASEMAP © ADOT



WSA

NUMBER OF MINING CLAIMS PER SECTION 37

AREA UNDER LEASE None

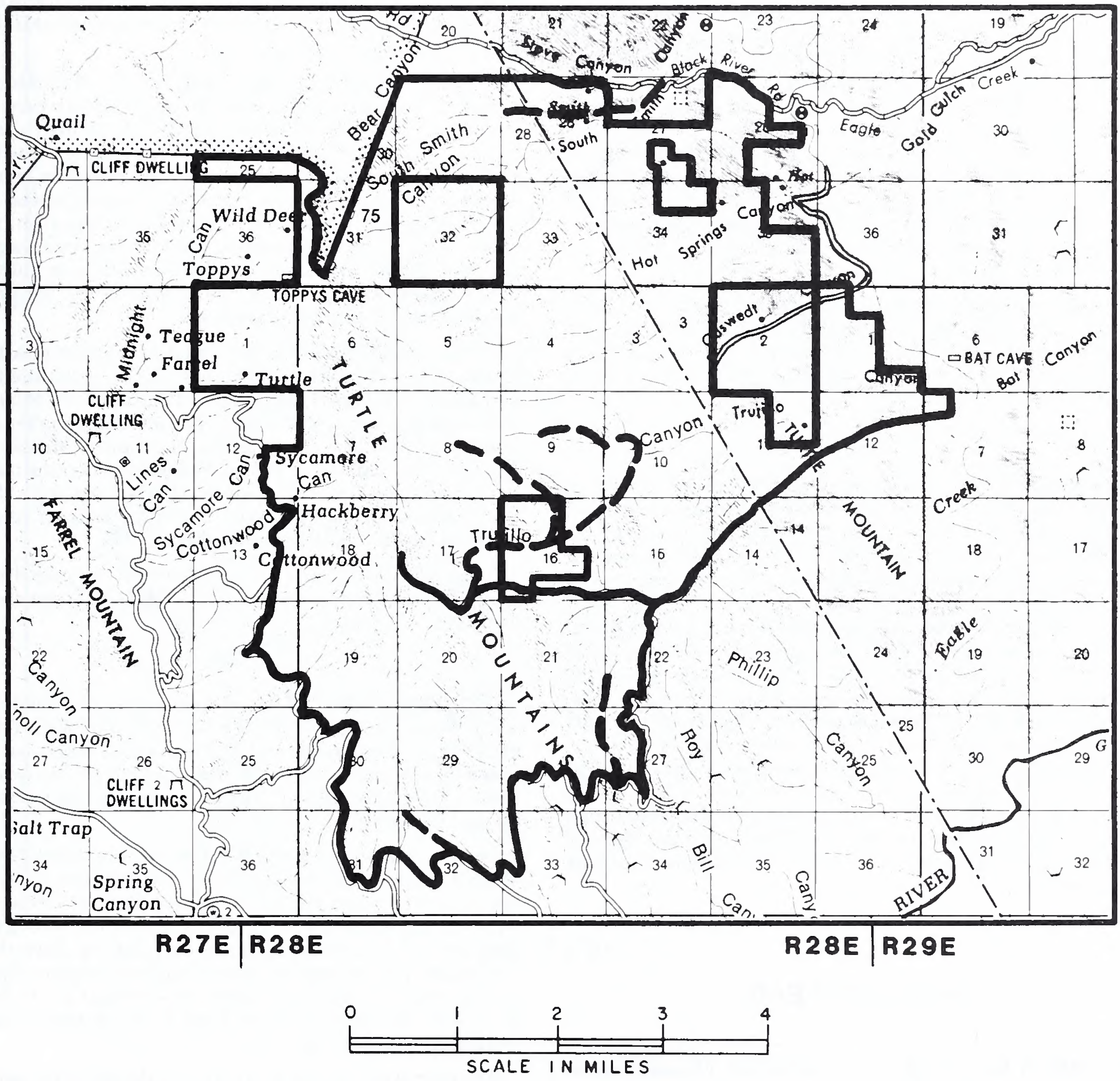
N

MAP 5

TURTLE MOUNTAIN 4-22/23/24 (B)

Mining Claims/Oil and Gas Leases

MAY 1986 BASEMAP © ADOT



WSA

NUMBER OF MINING CLAIMS PER SECTION None

AREA UNDER LEASE None

MAP 6

On the west-central edge of the Gila Box and directly south of the Turtle Mountain WSA, oxide copper mineralization is found along fractures in the Tertiary volcanics. Drilling in a 1,500-foot-deep drill hole reportedly found an oxidized monzonite porphyry with copper values of 0.2 percent.

The Tertiary basalt and andesite underlying the WSA have yielded no mineral production in the past. The area, however, cannot be readily dismissed as having no mineral potential, since it lies between Arizona's largest open pit mine and a relatively recent discovery of a district estimated to have over a billion tons of porphyry copper ore. Though the Morenci Mine lies near outcrops of Precambrian granitic rocks and Paleozoic limestones and quartzites, the Lone Star District is largely covered with volcanics of TertiaryCretaceous age. Whether a Laramide pluton hosting a porphyry copper deposit lies under the volcanic cover of the WSAs is unknown, the potentially economic rocks may be as much as 2,300 to 6,300 feet below the surface of the WSAs.

Of the minerals on the National Defense Stockpile Inventory of Strategic and Critical Materials, only manganese is found in the Gila Box WSA. As of September 1983, manganese was adequately stockpiled (FEMA 1983).

Energy. The lands within both WSAs are classified as prospectively valuable for geothermal resources. Gillard Hot Springs, on the north bank of the Gila River in the eastern part of the Gila Box WSA, discharges the hottest water in the southwest outside the Jemez Mountains of New Mexico. Temperatures range between 80°C to 84°C (176°-183°F) and geological, geophysical and geochemical studies suggest 150° C (302°F) temperatures below 2,000 meters (6,562 feet). Seven miles to the northwest, Eagle Creek Hot Springs, just outside the eastern edge of the Turtle Mountain WSA, discharges into a tributary of Eagle Creek. Shallow wells have tapped water up to 56° C (133° F). Geochemical studies suggest possible temperatures up to 150° C (302° F) at depth. Both the Gillard and Eagle Creek Hot Springs are in a northwest trending fault zone that crosses the eastern part of both WSAs, and geothermal potential along the fault is the same as at the hot springs (Witcher 1980).

JAVELINA PEAK

General Geology. The Whitlock Mountains, on the eastern side of the San Simon Valley, consist of mid-Tertiary volcanics ranging from basalt to rhyolite. The mountains are north by northwest trending and cut across the northeast portion of the WSA. The remainder of the WSA is Quaternary-Late Tertiary sedimentary deposits. Two northwest trending faults cut across the WSA. A dome flow complex with an eruptive center at Powerline Pass, just north of the WSA, probably formed during late Miocene-early Oligocene times.

Minerals. No known economic minerals occur within the WSA. The zeolite mineral chabazite, a few miles south of the WSA in a bedded deposits in the San Simon Valley, is known as the Bowie chabazite deposit. Current production from various open pits is estimated at 1,000 tons per year. It is not known whether the chabazite deposit extends into the southern portion of the WSA. Clinoptilolite is just north of the WSA in deposits unrelated to the bedded Bowie chabazite deposit. This clinoptilolite deposit doesn't appear to have the same production potential as the Bowie chabazite deposits.

North of the WSA, on the north flank of Dry Mountain, uranium minerals are within Pliocene-Pleistocene lacustrine strata. The uranium mineralization has been explored by pits, dozer cuts and a shaft. Extensive beds of diatomaceous material are within the Pliocene lacustrine strata in the general area of the uranium deposits. Pierce, however, states that the poor quality and lateral changes of material in surface exposures didn't offer encouragement for high purity diatomite production (Richter and others 1981). These strata are in the WSA, but no evidence of mineralization has been detected.

The potential for other minerals is unknown, although the presence of metallic minerals can be speculated. Commenting on the geologic map of the Whitlock Mountains and vicinity, Richter stated, "No metallic occurrences are known within the map area, but upper Mezoic-Lower Cenozoic intrusive and extrusive rock that contain significant porphyry copper deposits in the Safford area, 25 km to the northwest, may underlie the map area at relatively shallow depth" (Richter and others 1981).

None of the minerals on the National Defense Stockpile Inventory of Strategic and Critical Materials are known in the WSA.

Energy. In 1927 an oil well was drilled just outside the WSA in Section 36, T. 10 S., R. 28 E. The well, Whitlock State No. 1, was drilled to 1,925 feet and abandoned. Fresh artesian water was encountered at 1,080 feet but no oil was found. The State Oil and Gas Commission has no record of any oil showing.

In the eastern half of the WSA there are about 8,300 acres of land classified as prospectively valuable for geothermal resources. Investigation by the Geothermal Group of the Arizona Bureau of Geology and Mineral Technology show good potential in the area for direct heat use of geothermal resources. The oil well at the southeastern tip of the WSA encountered an artesian well with waters at 41° C (106° F). This well continues to flow from a conglomerate aquifer capped by siltstone and clay.

Another well 2.5 miles to the northeast reportedly discharged 34° C (93° F) water in the late 1970s. This well lies next to the WSA but has no pump and is unused. According to Witcher (1980), more wells 1,500 to 2,000 feet deep would likely find 40°-50° C (104°-122° F) water and might produce artesian flow exceeding 200-gallons per minute. Though a deep intermediate temperature resource (100°-150° C or 212°-302° F) is not confirmed, chemical geothermometry predicts a deep temperature of 104°-132° C (219°-270° F).

JAVELINA PEAK 4-48

Mining Claims/Oil and Gas Leases

MAY 1986

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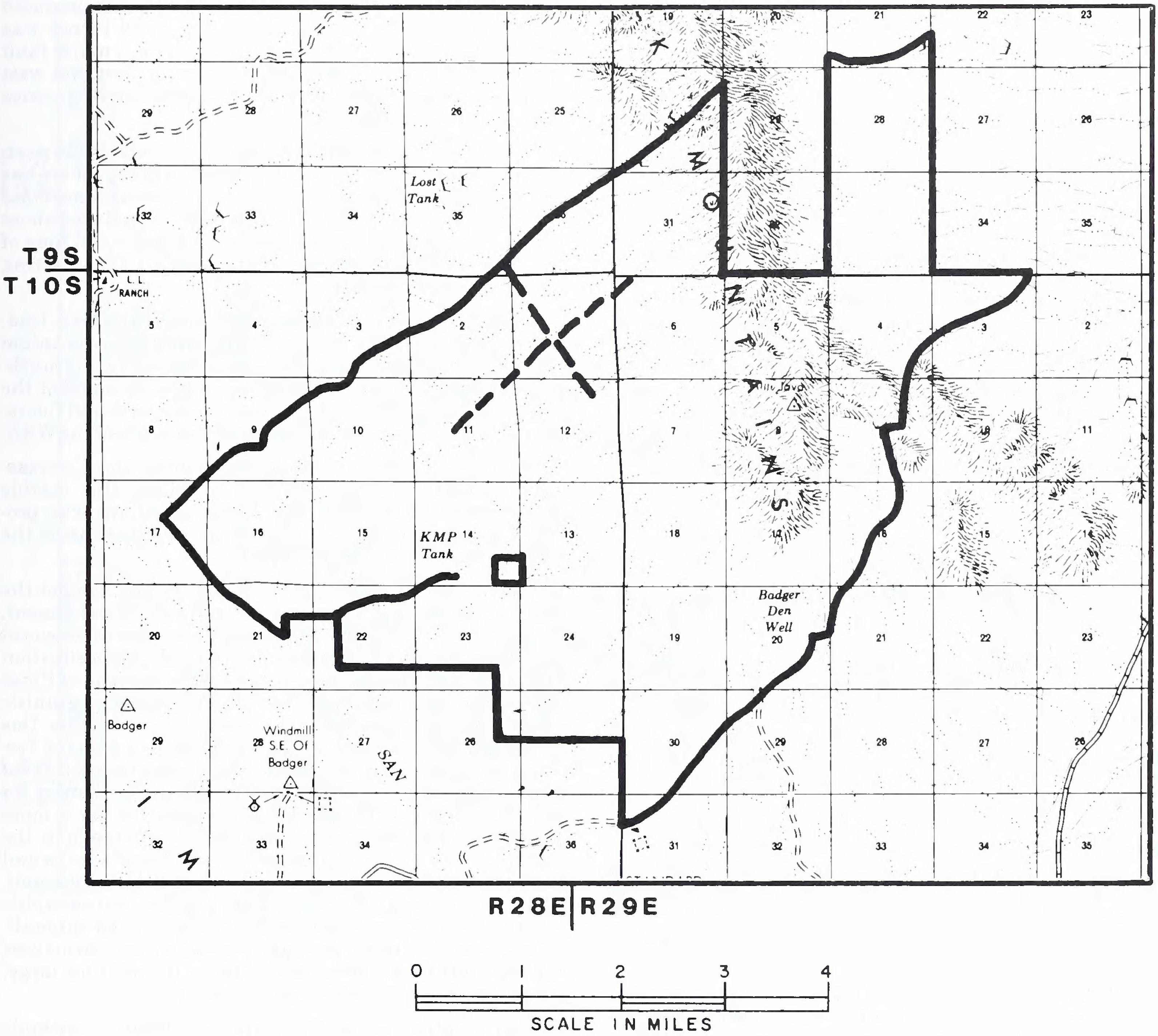

WSA ▬

NUMBER OF MINING CLAIMS PER SECTION None

AREA UNDER LEASE None

MAP 7

PELONCILLO MOUNTAINS

General Geology. The Peloncillo Mountains are composed of Tertiary volcanics lying above Paleozoic-Mesozoic sedimentary layers. Basin and Range faulting resulted in a horst block with a north-south axis. The WSA portion of the Peloncillos consists entirely of mid-Tertiary volcanics ranging from rhyolite to basalt. Several northwest-striking faults run through the WSA.

Minerals. No known economic minerals are within the WSA. Manganese is found a few miles south of the WSA along the Arizona-New Mexico border in a mid-Tertiary andesite flow. The Steins Pass Mining District, southeast of the WSA in New Mexico, has produced lead, zinc, copper, silver and small amounts of gold and tungsten. One mine, 2 miles south of the WSA, produced significant amounts of gold and silver. The Peloncillo Mining District lies to the west of the Steins Pass District and about 6 miles south of the WSA. The possibilities for economic mineralization in this district are not favorable (Keith 1973). The prospects for mineralization within the WSA, based on the theory that the mid-Tertiary volcanics present may cover potential ore bodies, must be considered largely speculative.

None of the minerals on the National Defense Stockpile Inventory of Strategic and Critical Materials are known in the WSA.

DOS CABEZAS MOUNTAINS

General Geology. Dos Cabezas Mountains comprise the bulk of the WSA and are a typical block-faulted range of the Mexican Highland section of the Basin and Range physiographic province. The Precambrian basement complex under the WSA consists of Pinal Schist and granitic intrusives. This is overlain by a series of Mesozoic-Paleozoic sedimentary strata, with some areas covered by Tertiary-Cretaceous volcanics. Existing structures are probably due to extensive folding, faulting and other intrusive activity during the Laramide. Several northwest trending faults are throughout the range, and some cut through the WSA.

Minerals. Dos Cabezas Mountains WSA lies within the Dos Cabezas-Teviston Mining District, which has produced about 100,000 tons of ore, including gold, copper, lead, silver and iron. The mineralization generally occurred in fissure zones and replacement veins cutting through metamorphosed sedimentary beds and porphyrytic intrusives. The Buckeye Mine, inside the northwestern portion of the WSA, is an underground mine producing gold with silver and lead by-products from quartz veins in Precambrian granitic rocks cut by dikes of diabase and rhyolite and andesite porphyries.

The Silver Strike Mine lies just outside the southeastern part of the WSA. This underground mine produced lead and silver with tungsten, zinc and copper by-products from ore in a quartz plug within MesozoicPaleozoic sedimentary layers.

The most intense concentration of mining activity occurred just south and west of the WSA, where several mines produced gold, silver, lead, zinc and copper. Two of these mines, the Gold Prince and the Dives, each produced more than 10,000 tons of gold ore. The Gold Prince was recently been brought back into production. A major fault system related to this mineralization runs east and west along the southern edge of the WSA, separating Cretaceous shale and Precambrian granite.

Another area of mineralization lies just outside the western boundary of the WSA. A large amount of copper ore has been mined in this area from veins in Paleozoic limestones and Laramide intrusives. The Mascot Mine produced about 60,000 tons of ore and the Elma Mine about 8,000 tons of ore. Iron ore was also produced from magnetite occurring as replacement deposits.

In addition to the past producers of gold, silver, lead, copper and iron in the vicinity, other minerals are uranium just south of the WSA boundary, tungsten along the northern and southern boundaries, manganese in some of the gold and copper workings to the south and west and fluorspar occur on the northwest and southern edges of the WSA.

Other reported mineral occurrences in the Dos Cabezas-Teviston District include bismuth, beryllium, zinc, marble and semiprecious gemstones. Some beryllium was produced from open cut workings in an area just inside the WSA's southeastern boundary.

The number of mineral occurrences in and around the WSA show strong potential for mineral development. While most of the known mineralization is just to the south and west of the WSA, this does not preclude mineralization in the interior. Though much of the WSA consists of Pinal Schist, the area also contains the Precambrian granitic rocks that bear much of the mineralization of the Dos Cabezas-Teviston District. The WSA also has areas of Tertiary and Cretaceous volcanics, which are also associated with extensive mineralization throughout the district. In addition, Keith (1973) mentions the potential for a more significant discovery than those previously made in the district: "The known ore deposits in the Dos Cabezas and Teviston Mining Districts appear to be relatively small, spotty, and low-grade veins and contact metamorphic bodies. However, the widely scattered and varied mineralization, and favorable geologic formation and structures suggest that possibilities still exist in the area for large, low-grade, disseminated copper deposits".

Several minerals on the National Defense Stockpile Inventory of Strategic and Critical Materials are found or have been produced near the WSA, including beryllium, copper, fluorspar, lead, zinc, manganese, silver and tungsten. There is an adequate supply of manganese, silver and tungsten. Manganese and tungsten may be in the WSA and silver has been produced in the Buckeye Mine and may be found elsewhere in the western portion of the WSA. There is not an adequate supply of the other minerals listed.

PELONCILLO MOUNTAINS 4-60

Mining Claims/Oil and Gas Leases

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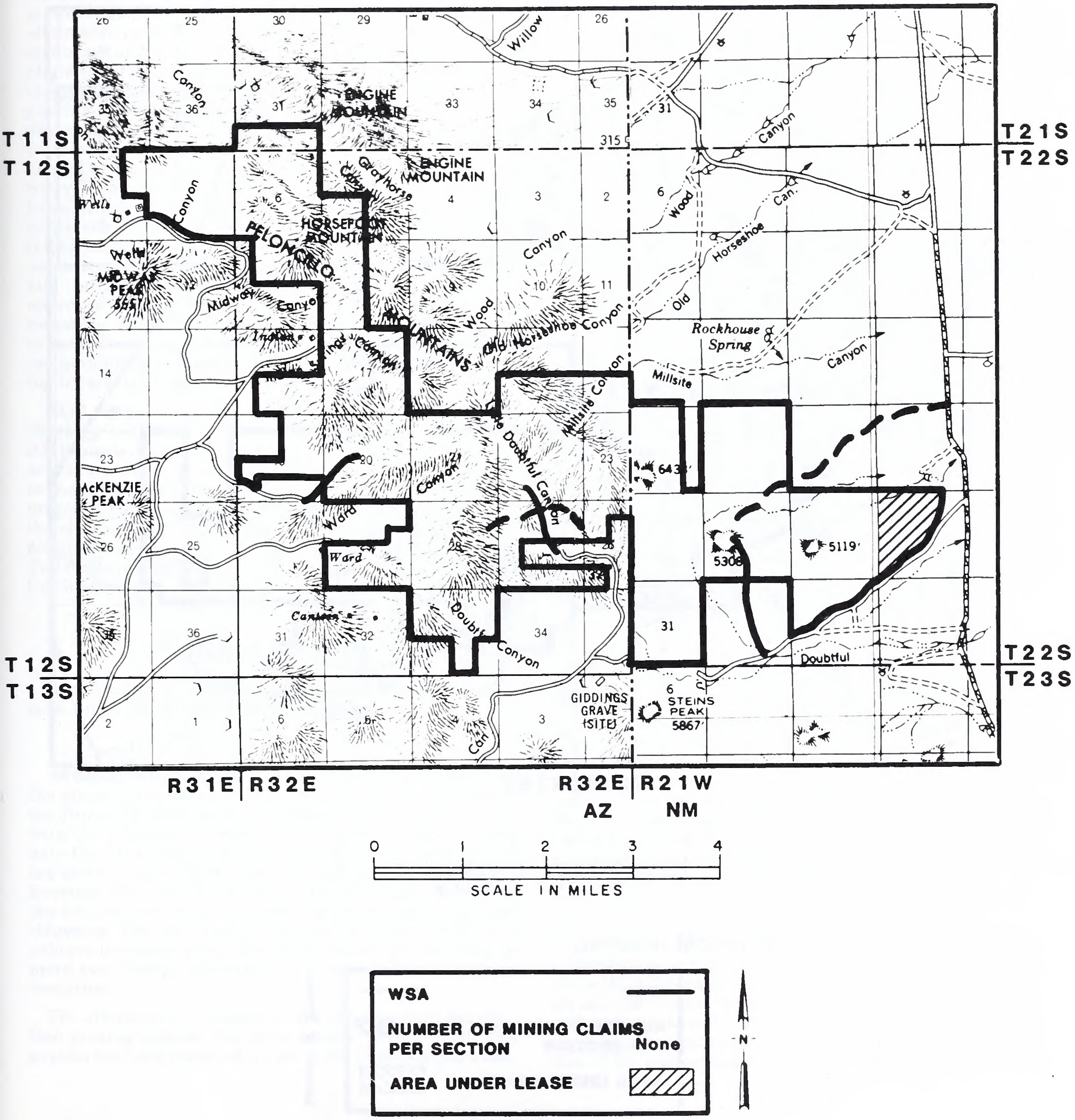
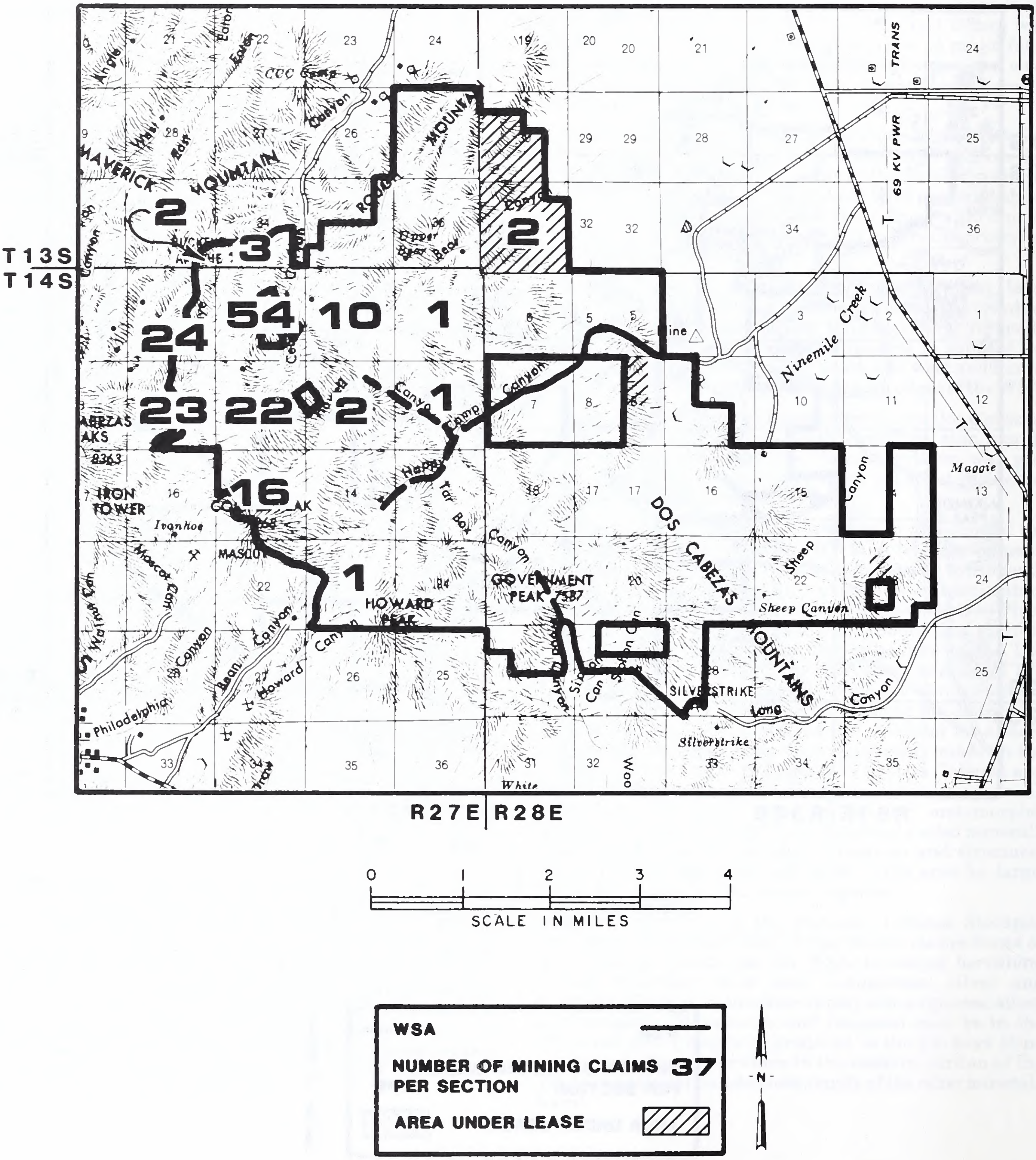


MAP 8

DOS CABEZAS MTNS. 4-65

Mining Claims/Oil and Gas Leases

MAY 1986 BASEMAP © ADOT



MAP 9

LIVESTOCK GRAZING

All or parts of 34 grazing allotments are within the nine WSAs, and actual livestock use totals 12,338 animal unit months (AUMs). Table 3-7 provides a general overview of livestock grazing by WSA and allotment.

With the completion of the Upper Gila-San Simon Grazing EIS (BLM 1978), the Safford District began developing plans for grazing management on each of the 34 grazing allotments within the nine WSAs. Eighteen of these allotments are operating under signed allotment management plans (AMPs), but the other 16 have none. These plans identify livestock facilities needed to implement a desired grazing system. The purpose of these facilities is to aid proper management of the livestock forage, not necessarily to increase range use (AUMs). The developments are needed to improve rangeland condition and forage productivity. If improved rangeland condition could support additional livestock use, an increase in the use levels would be considered. Once a particular need is identified, the project is located, engineered, analyzed through an environmental assessment and built. Through environmental assessment and project design, new livestock facilities may be approved to enhance both wilderness and rangeland resources. Table 3-8 shows the livestock facilities proposed in each allotment and each WSA. Many of these proposals are preliminary—specific locations and designs not having been determined.

BLM regularly monitors AMPs for their effectiveness, checking the range for changes in condition and trend. AMPs are dynamic documents and grazing systems, actual use and livestock management facilities are subject to change in response to resource changes. If changes were proposed for an allotment in a WSA, BLM would evaluate the effects on the wilderness values and on the rangeland resource so as to maintain these resources for future use. Following is a discussion of livestock grazing in each WSA by allotment.

NEEDLE'S EYE

Parts of two allotments, Mescal Mountain and Christmas, are in Needle's Eye WSA (see Map 10).

Mescal Mountain. Approximately 8,625 acres of the allotment (total is 12,716) are in the WSA. The range condition of the allotment varies from ridgetop to bottoms, with the ridgetops in excellent condition and the bottoms only fair. The trend is static. This allotment is not operating under a signed AMP but is being managed to improve livestock distribution throughout the allotment. At present the bottoms are being used and not the steeper slopes and ridgetops. The objective of the rest rotation system is to achieve livestock use on the entire allotment, resulting in more even forage utilization and improvement of range condition.

The allotment is managed with a three-pasture rest rotation grazing system. The fence needed to implement this system has been installed. To aid in his livestock operation, the rancher has proposed a road to Dick Spring (see Map 10) and a corral at the spring. BLM is proposing to fence the Gila River on this allotment but fence locations have not been identified to date. No other range facilities are proposed at this time.

Approximately 71 percent (1,086 AUMs) of the licensed animal unit months in the allotment are within the WSA.

Christmas. Approximately 1,091 acres of the allotment (total is 9,190) are in the WSA. The condition of the allotment in the WSA is excellent and the trend is static. The entire allotment is grazed yearlong but very little use (only 85 AUMs) occurs within the WSA. The entire allotment is licensed for 708 AUMs. No range improvements are planned for the allotment in the WSA.

BLACK ROCK

Parts of three allotments are in Black Rock WSA: Black Rock, Spenazuma/Holdup Canyon and Jackson Mountain (see Map 11).

Black Rock. Approximately 1,727 acres of the allotment (total is 3,534) are in the WSA. The range condition of the allotment is poor to fair but in an upward or improving trend. The allotment is operating under a cooperative AMP with the BLM and Coronado National Forest and a rest rotation system has been implemented to improve range condition. The public lands in the WSA are grazed approximately one year out of three to allow the forage to recover and improve its vigor before the next year of use. No additional range facilities are proposed. Maintenance of existing facilities is the only necessary activity. The whole allotment is licensed for 276 AUMs with 97 AUMs (about 35 percent) of the use in the WSA.

Spenazuma/Holdup Canyon. Approximately 4,180 acres of the allotment (total is 6,142) are in the WSA. The range condition of the western portion of the allotment is fair while the eastern portion north of Jackson Mountain is in excellent condition. The trend is static throughout the allotment. This allotment is experiencing distribution problems because livestock are not using the higher, rougher country on the north slopes of Jackson Mountain. The allotment is on a deferred rotation system and additional waters (see Table 3-8) are needed to improve distribution and forage utilization. The allotment is licensed for 804 AUMs with 571 AUMs (about 71%) in the WSA.

Jackson Mountain. Approximately 2,585 acres of the allotment (total is 5,372) are in the southern portion of the WSA. This allotment is operated in conjunction with an adjacent Forest Service allotment. The range condition of the allotment varies from poor to good. The bottom country is in poor condition with a downward trend. The condition of the steeper country on the south slopes of Jackson

TABLE 3-7
GRAZING ALLOTMENTS IN THE WSAs

Bureau of Land Management
Safford District, Arizona

WSA	Allotment Name	Management*	Acres in WSA	% in WSA**	Actual Use ***	Grazing System
Needle's Eye	Mescal Mountain	I	8,625	71	1,086	Rest rotation
	Christmas	I	1,091	12	85	Yearlong
Black Rock	Black Rock	I	1,727	49	97	Rest rotation
	Spenazuma/Holdup Cyn.	I	4,180	68	571	Deferred rotation
	Jackson Mountain	I	2,585	48	209	Yearlong
Fishhooks	Diamond Bar	I	11,445	39	926	Yearlong
	Tom Springs	M	1,774	11	265	Rest rotation
	Day Mine	I	1,996	4	120	Deferred rotation
Day Mine	Day Mine	I	17,309	31	1,118	Deferred rotation
Gila Box	Twin C	I	1,939	19	157	Rest rotation and Deferred rotation
	County Line	I	1,219	11	240	Deferred rotation
	Gila	I	689	40	79	Yearlong
	Zorilla	I	3,315	30	383	Yearlong
	Smuggler Peak	I	1,694	17	198	Yearlong
	Morenci	C	2,055	3	108	Yearlong
	Bull Gap Community	I	2,660	29	165	Yearlong
	Turtle Mountain	I	4,260	20	587	Yearlong
Turtle Mountain	Bonita Creek	I	3,268	12	420	Yearlong
	Bull Gap Community	I	2,054	23	495	Yearlong
	Turtle Mountain	I	12,100	56	1,828	Yearlong
Javelina Peak	Hackberry	I	7,030	3	133	Rest rotation
	Tanque	I	9,910	13	574	Rest rotation
	Badger Den	I	3,047	6	30	Yearlong
Peloncillo Mountains	Lazy B	I	1,190	1	87	Rest rotation
	Little Doubtful	M	2,685	100	480	Yearlong
	Braidfoot	I	3,135	32	396	Yearlong
	Midway Canyon	I	2,657	46	186	Rest rotation
	Joy Valley	I	2,340	4	235	Rest rotation
	Rooster Comb	I	310	1	0	Yearlong
Dos Cabezas Mountains	Ivanhoe	M	234	4	10	Yearlong
	Happy Camp	I	1,903	83	0	No grazing
	Sheep Canyon	I	2,910	36	327	Yearlong
	Rough Mountain	I	9,235	25	720	Yearlong
	Siphon Canyon	C	734	57	72	Yearlong
	Silverstrike	I	416	4	60	Rest rotation
	Dos Cabezas	I	2,335	19	350	Yearlong
	Nine Mile	C	742	16	60	Yearlong

* I — Improve, M — Maintain, C — Custodial (See Glossary)

** Percentage of the allotment in the WSA. For example in the Gila Allotment 40% (689 acres) of the total allotment (1,720 acres) is in the WSA.

*** Animal Unit Months (AUMs) within the WSA

Source: Safford District Files

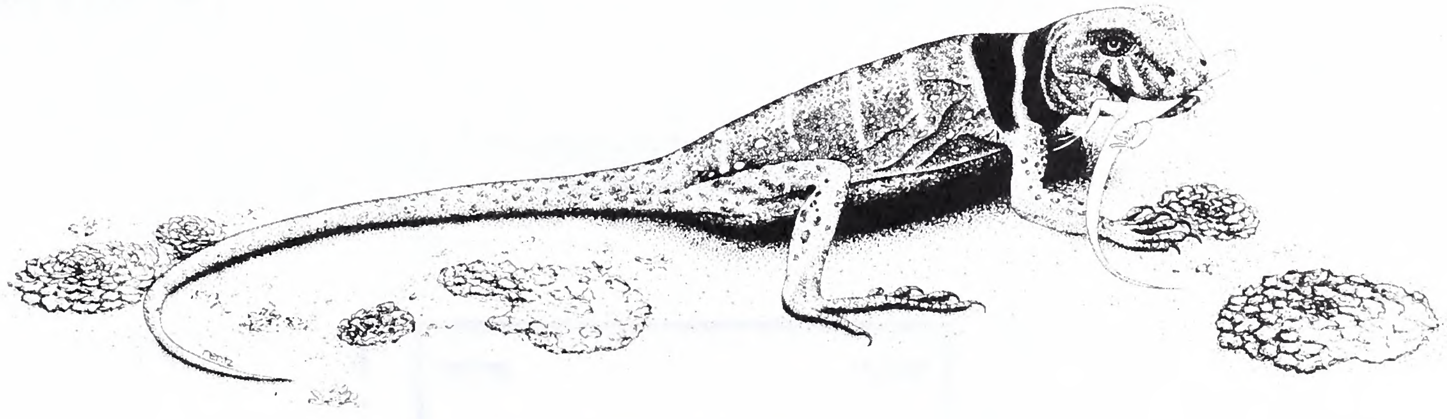
TABLE 3-8
PROPOSED LIVESTOCK FACILITIES*

Bureau of Land Management
Safford District, Arizona

WSA	Allotment	Proposed Livestock Facilities
Needle's Eye	Mescal Mountains	fence — 4 miles; road construction — 2½ miles; corral
Black Rock	Spenazuma/Holdup Canyon	** fence — 1 mile; ** 2 slickrock catchments, pipelines and storages; stock trail construction — ½ mile
Fishhooks	Diamond Bar	fence — 1 mile; 2 spring developments, one with a storage tank; ** 1 spring development; 1 catchment
Day Mine	Day Mine	fence — 1 mile; 3 slickrock catchments and storage tanks; 1 rock and concrete dam; stock trail construction — ½ mile; 1 dirt dam
Gila Box	Smuggler Peak	** pipeline, storage tank and trough;
	Turtle Mountain	** pipeline and trough
Turtle Mtn.	Bullgap Community	pipeline — 4 miles; storage tank; 3 troughs;
	Turtle Mountain	1 spring development; ** 1 spring development; pipeline — 4 miles; 2 storage tanks; 4 troughs; 2 traps, ¾ mile fence; stock trail construction
Peloncillo Mountains	Midway Canyon	** 1 rock and concrete dam and 2 small storage tanks
Dos Cabezas Mountains	Sheep Canyon	fence — 3 miles

* No facilities are authorized or proposed for Javelina Peak WSA at this time.
** Facilities authorized but not constructed.

Source: Safford District Files



NEEDLE'S EYE 4-1A

Grazing Allotments

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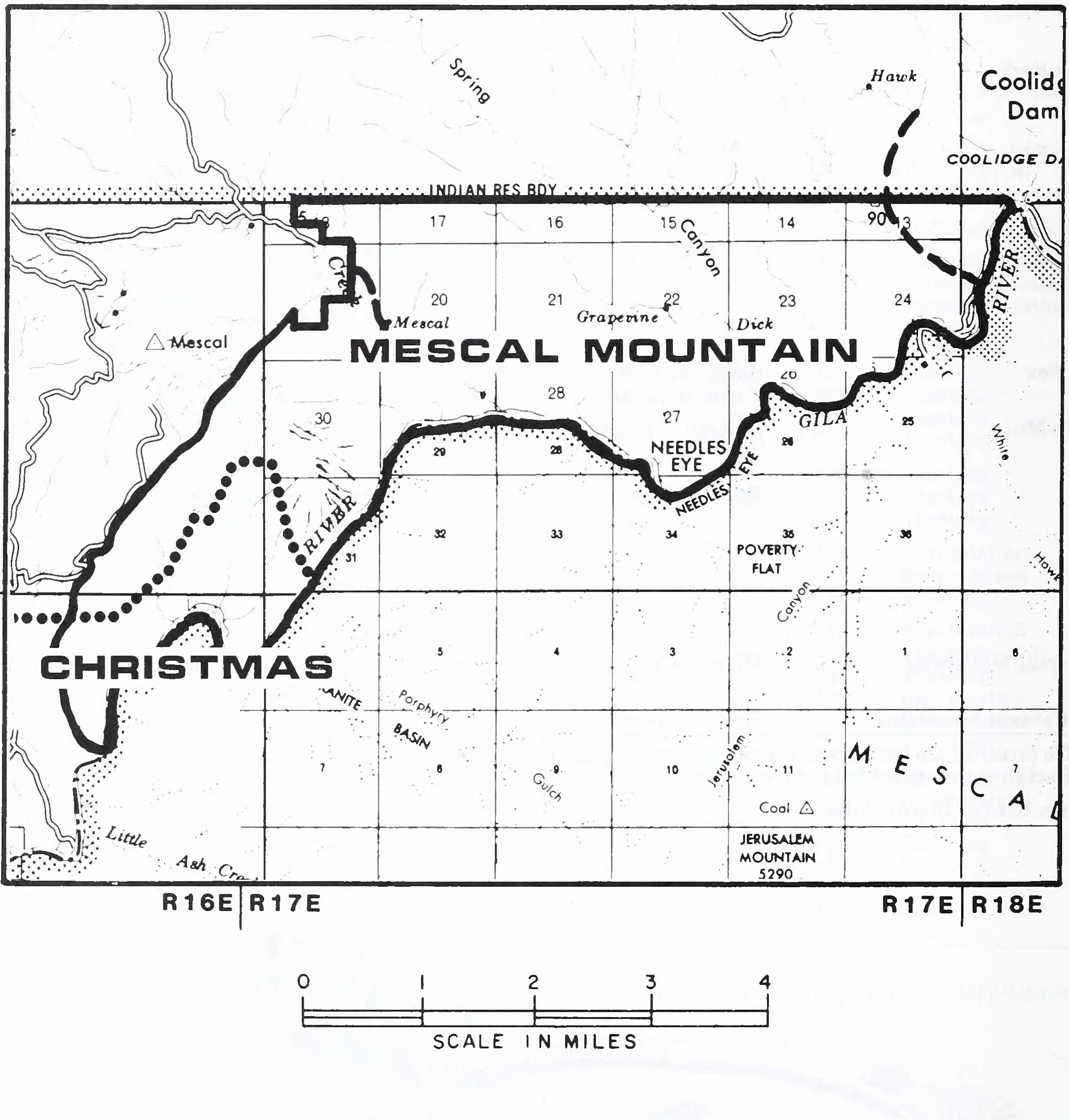

WSA	▬
ALLOTMENT BOUNDARY	●●●●

MAP 10

BLACK ROCK 4-8

Grazing Allotments

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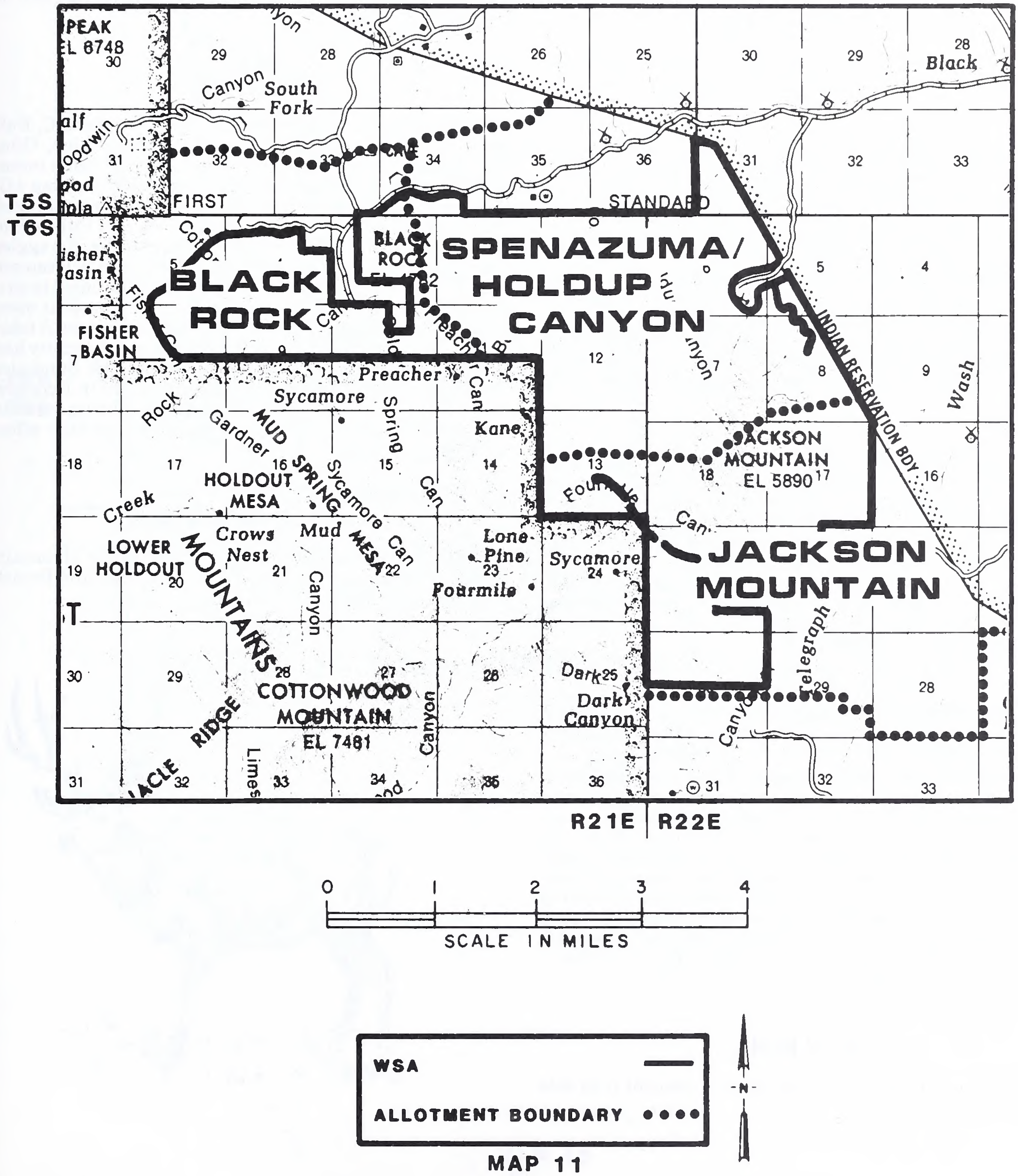

MAP 11

Mountain is good and the trend is static. Cattle are not evenly distributed throughout the allotment. Overuse of the lowlands and under use of the rougher country has resulted in the current range condition and trend. No livestock facilities are planned at this time. The entire allotment is licensed for 804 AUMs with about 26 percent of the use (209 AUMs) in the WSA.

FISHHOOKS

Parts of three allotments are in the Fishhooks WSA: Diamond Bar, Tom Springs and Day Mine (see Map 12).

Diamond Bar. The entire allotment includes 29,620 acres stretching from the Gila Valley to the crest of the Gila Mountains with about 11,445 acres in the WSA. The allotment is grazed yearlong with an occasional deferment of pasture. The condition of the allotment is good and the trend is static; however, cattle are overusing the rangeland outside the WSA and underusing the land within the WSA. To improve livestock distribution and forage utilization, the proposed livestock facilities (identified in Table 3-8) are needed to sustain the cattle in the WSA portion of the allotment. The entire allotment is licensed for 4,200 AUMs, with 926 AUMs (22 percent) of the use in the WSA.

Tom Springs. Approximately 1,774 acres of the allotment (total is 16,485) are in the WSA. This allotment, with a signed and implemented AMP, uses a rest rotation system and is in good condition with a static trend. Parts of two pastures are in the WSA and are grazed every other year. The BLM objective is to maintain the current good range condition. No additional range facilities are proposed but occasional maintenance will be needed. The total allotment is licensed for 1,164 AUMs, with 265 AUMs (23 percent) of the use in the WSA.

Day Mine. Approximately 1,996 acres of this allotment (total is 56,501) are in the WSA. This allotment is operating under a signed AMP and cattle are grazing on a deferred rotation grazing system. There are distribution problems with cattle overusing the lower, gentler rangeland outside the WSA and underusing the forage in the WSA. Even though the range condition is good and the trend is static, improved livestock distribution would result in more even forage utilization and better range condition. Maintenance of a dirt reservoir and cherrystem road in the eastern portion of the WSA would provide water for cattle and help improve the distribution problem. The total allotment is licensed for 3,336 AUMs with 120 AUMs (4 percent) in the WSA.

DAY MINE

Only one allotment, the Day Mine Allotment is in this WSA (see Map 13).

Day Mine. Approximately 17,309 acres of the allotment (total is 56,501) are in the WSA. This allotment is operating on a deferred rotation grazing system and has some livestock distribution problems. The range condition is good and the trend is static. However, in order to increase forage use in the WSA and lessen overuse outside the WSA, five waters and stock trails are needed to provide access and water for the cattle in the WSA. The total allotment is licensed for 3,336 AUMs, with 1,118 AUMs (31 percent) of the use in the WSA.

GILA BOX

Parts of eight allotments are in the WSA: Twin C, Bull Gap Community, Turtle Mountain, County Line, Gila, Zorilla and Smuggler Peak Allotments are all being intensively managed to improve range condition (see Map 14). The Morenci Allotment is a custodial allotment managed essentially as the allottee prefers, because very little public land is included in the allotment. Gila, Zorilla, Smuggler Peak, Morenci, Bull Gap and Turtle Mountain Allotments are all grazed yearlong. The County Line Allotment is on a deferred rotation system and the Twin C Allotment operates under both a rest and deferred rotation system. A total of 1,917 AUMs of use occur in the WSA. A water facility has been authorized for construction in both the Smuggler Peak and Turtle Mountain Allotments to aid in livestock management (see Table 3-8). The existing grazing systems are implemented and are being monitored for their effectiveness.

TURTLE MOUNTAIN

Parts of three allotments are in the Turtle Mountain WSA: Bull Gap Community, Turtle Mountain and Bonita Creek (see Map 15).

FISHHOOKS 4-14

Grazing Allotments

MAY 1986

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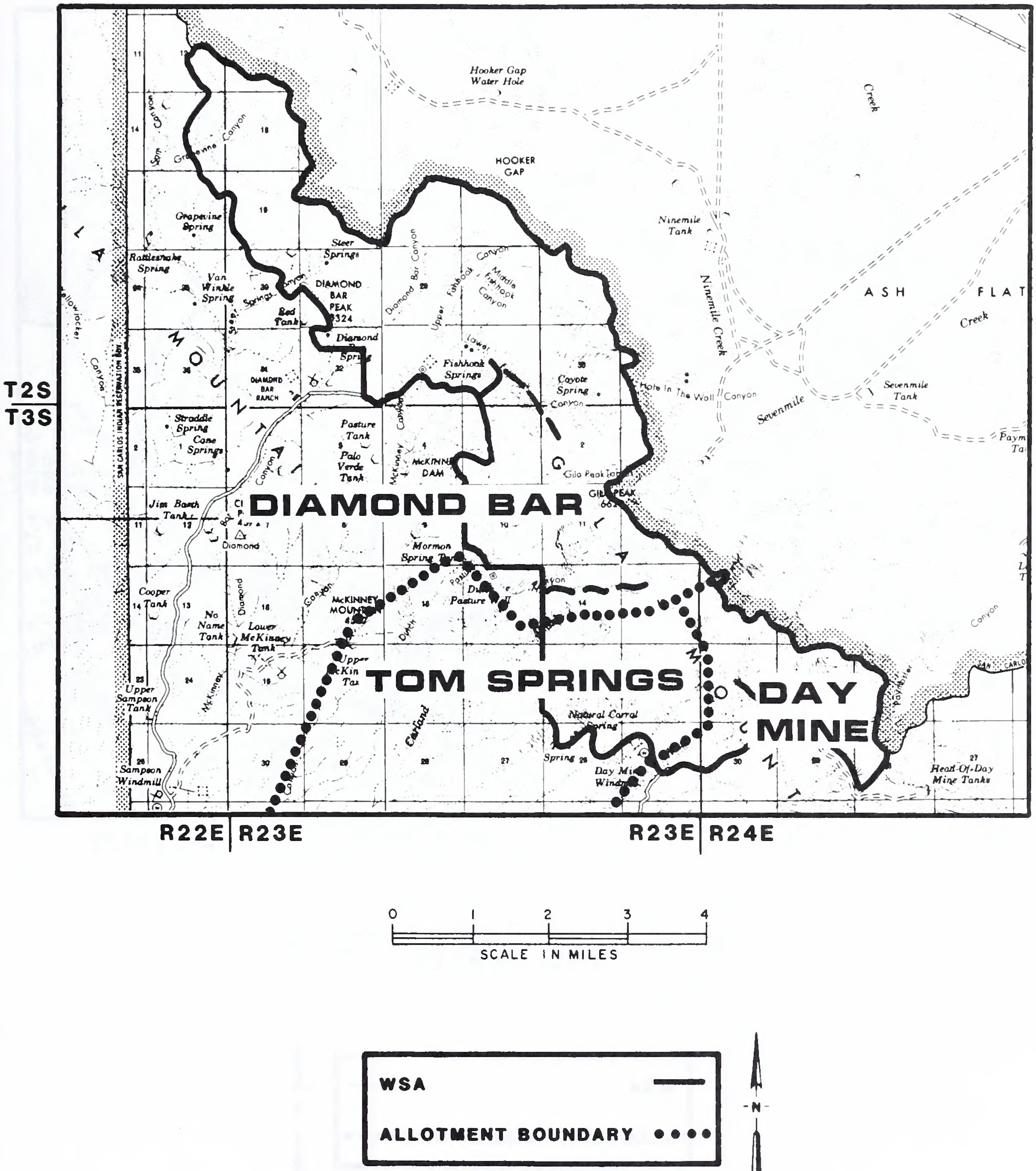

MAP 12

DAY MINE 4-16

Grazing Allotments

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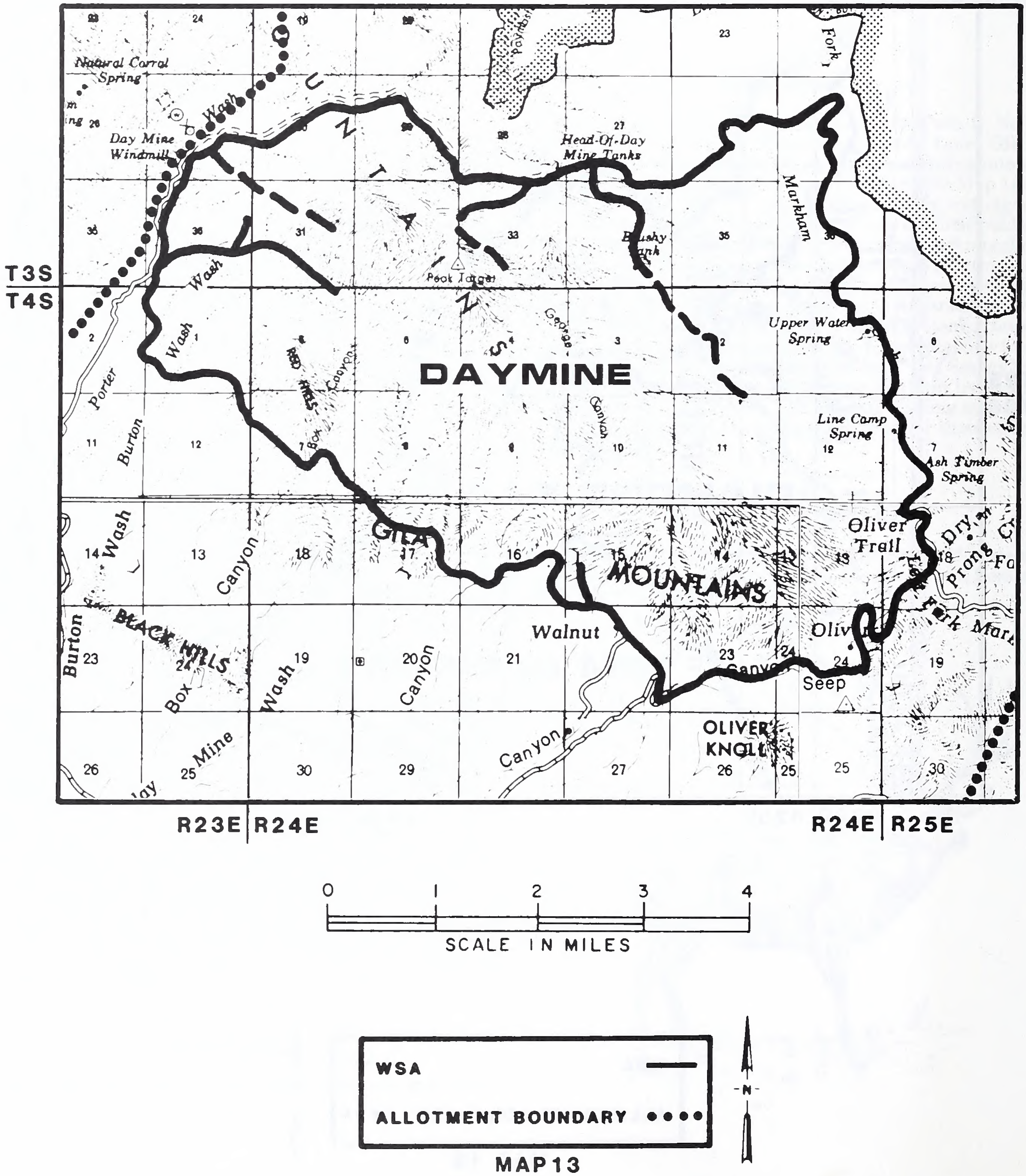

MAP 13

GILA BOX 4-22/23/24 (A)

Grazing Allotments

MAY 1986

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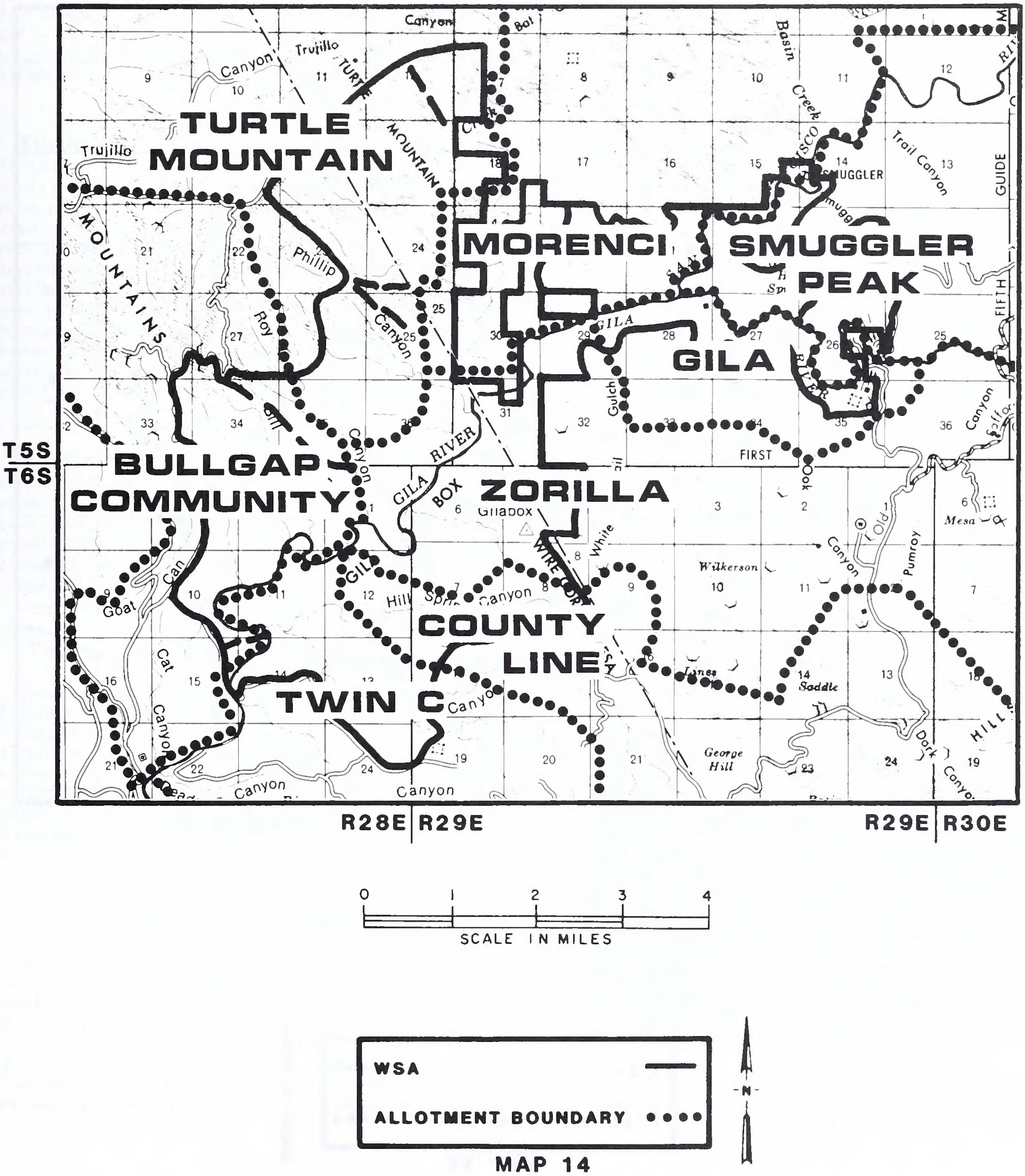

MAP 14

TURTLE MOUNTAIN 4-22/23/24 (B)

Grazing Allotments

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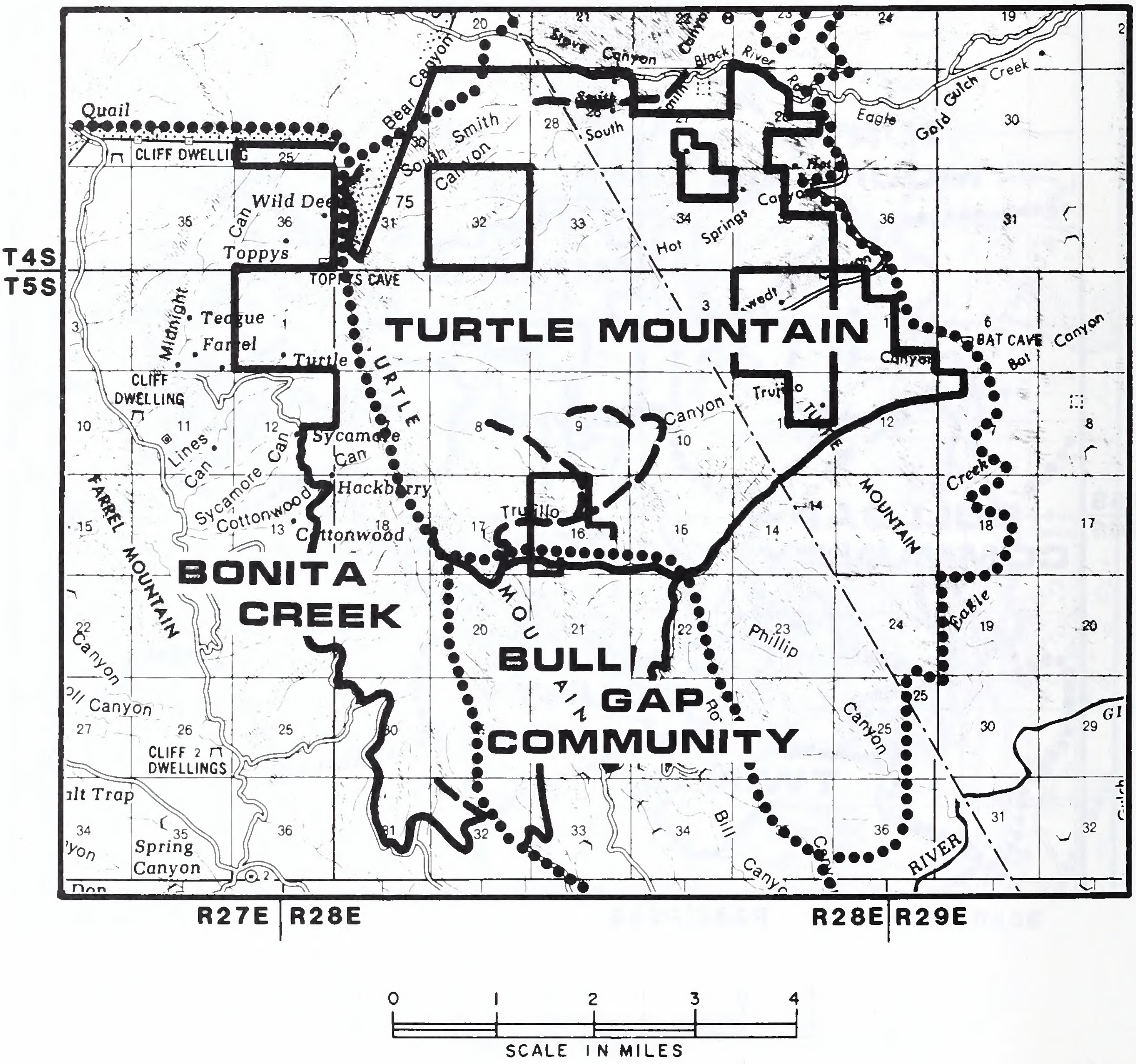

WSA	—
ALLOTMENT BOUNDARY	● ● ● ●

N

MAP 15

Bull Gap Community. Approximately 2,054 acres of the allotment (total is 9,036) are in the WSA. The allotment is in good condition with static trend and is grazed yearlong. Livestock distribution is a problem — cattle are not using the northern portion of the allotment toward the Turtle Mountain ridgeline and are overusing the remainder of the allotment. Installation of a pipeline, storage and troughs would provide water for livestock in the northern portion of the allotment and livestock would then be able to utilize the forage. The result would be less use of overused areas and better range condition. The entire allotment is licensed for 1,248 AUMs, with 495 AUMs (40 percent) of use in the WSA.

Turtle Mountain. Approximately 12,100 acres of the allotment (total is 21,550) are in the WSA. Cattle currently use the allotment yearlong. The trend is static, with steep slopes and ridgetops in excellent condition and bottoms only fair. This allotment has the forage utilization and distribution problems common to allotments with limited water sources and steep and rough terrain. A number of water facilities and stock trails are proposed to provide access and water for cattle in the underutilized portions of the allotment (see Table 3-8). The result would be a more balanced distribution of livestock and utilization of forage. The entire allotment is licensed for 3,264 AUMs, with 1,828 AUMs (56 percent) of use in the WSA.

Bonita Creek. Approximately 3,268 acres of the allotment (total is 29,284) are in the WSA. Cattle use the allotment yearlong and the range condition in the WSA is good with a static trend. No range improvements are proposed for this allotment in the WSA. The entire allotment is licensed for 3,444 AUMs, with 420 AUMs (12 percent) of use in the WSA.

JAVELINA PEAK

Parts of three allotments are in the WSA: Hackberry, Tanque and Badger Den (see Map 16). All allotments are managed to improve range condition. The Hackberry and Tanque Allotments are operating on rest rotation grazing systems while Badger Den Allotment is grazed yearlong. A total of 737 AUMs are in use in the WSA. No livestock improvement projects are needed in the WSA at this time. Existing grazing systems are working and being monitored for their effectiveness.

PELONCILLO MOUNTAINS

All or part of six allotments are in the WSA (see Map 17). All allotments except Little Doubtful are intensively managed to improve range condition. Little Doubtful Allotment is managed to maintain the present fair to excellent range condition. Little Doubtful, Braidfoot and Rooster Comb Allotments are grazed yearlong. The Lazy B, Midway Canyon and Joy Valley Allotments are operated on rest rotation grazing systems. The six allotments support a total of 1,384 AUMs in the WSA. A rock and concrete dam and two small storages have been authorized for construction in Midway Canyon Allotment to aid in livestock management (see Table 3-8). Existing grazing systems are working and are being monitored for their effectiveness.

DOS CABEZAS MOUNTAINS

Parts of eight allotments are in the WSA (see Map 18). Happy Camp, Sheep Canyon, Rough Mountain, Silverstrike and Dos Cabezas Allotments are all intensively managed to improve rangeland condition. The Ivanhoe Allotment is managed to maintain the present excellent range condition while Siphon Canyon and Nine Mile are custodial allotments managed by the livestock operator with little involvement by the BLM. The Ivanhoe, Sheep Canyon, Rough Mountain, Siphon Canyon, Dos Cabezas and Nine Mile Allotments are all grazed yearlong. The Silverstrike Allotment is on a rest rotation grazing system and there is no grazing on the Happy Camp Allotment in the WSA. These eight allotments in the WSA support a total of 1,599 AUMs. Three miles of pasture fence are proposed to implement a grazing system in Sheep Canyon (see Table 3-8). Existing grazing systems are working and are being monitored for their effectiveness.

RECREATION

Outdoor recreation within the WSAs is generally dispersed and widespread, involving no use of developed recreation areas. Because of the varied nature of the WSAs, there are many different activities, some unique to individual WSAs.

The main recreation activity in all WSAs is hunting for deer, javelina, dove, quail and waterfowl. Because much hunting depends on vehicle access and the presence of water, parts of each WSA receive little or no hunting pressure.

Looking down Happy Camp Canyon beyond the WSA boundary, one can see the San Simon Valley.

JAVELINA PEAK 4-48

Grazing Allotments

MAY 1986

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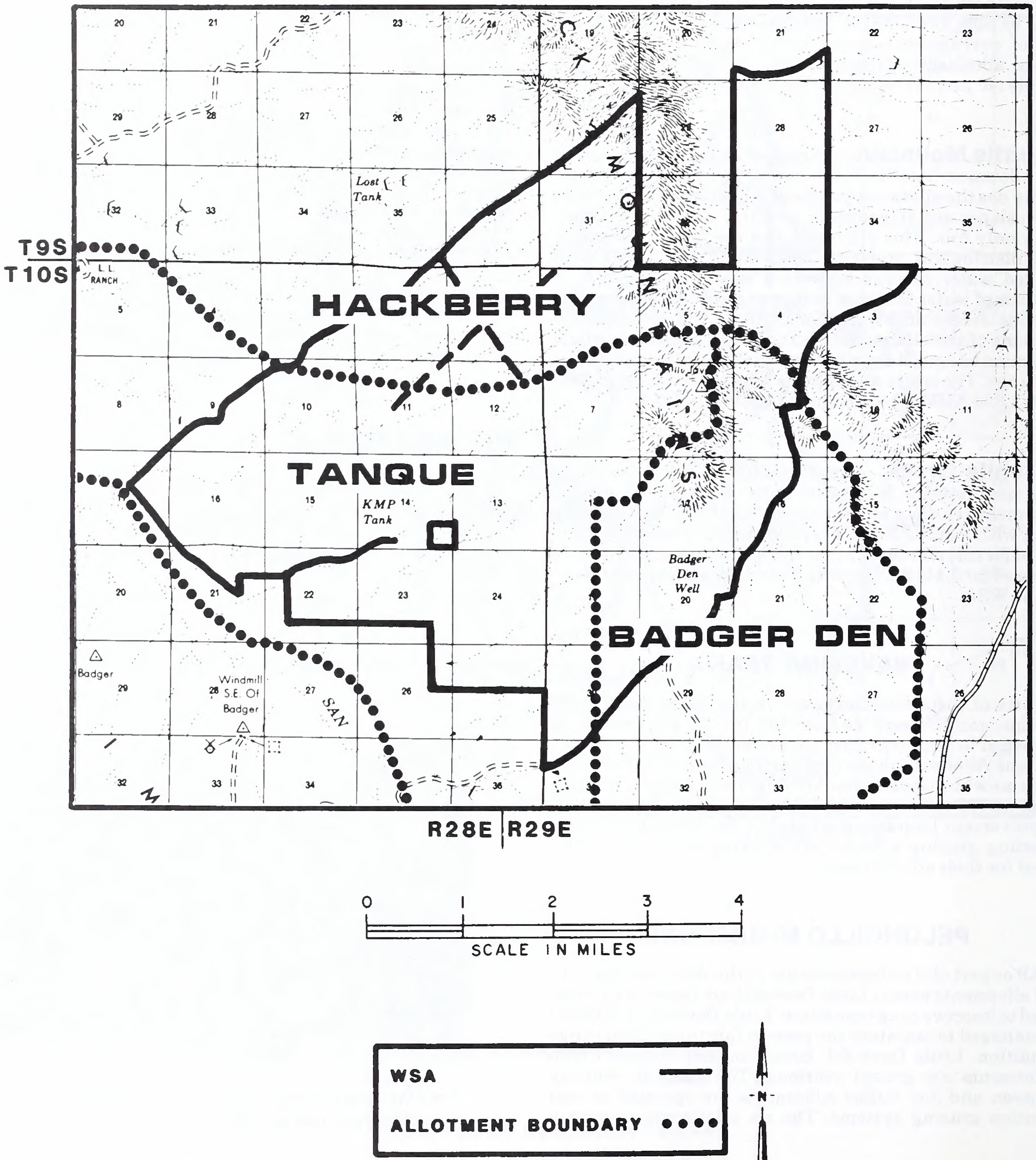

MAP 16

PELONCILLO MOUNTAINS 4-60

Grazing Allotments

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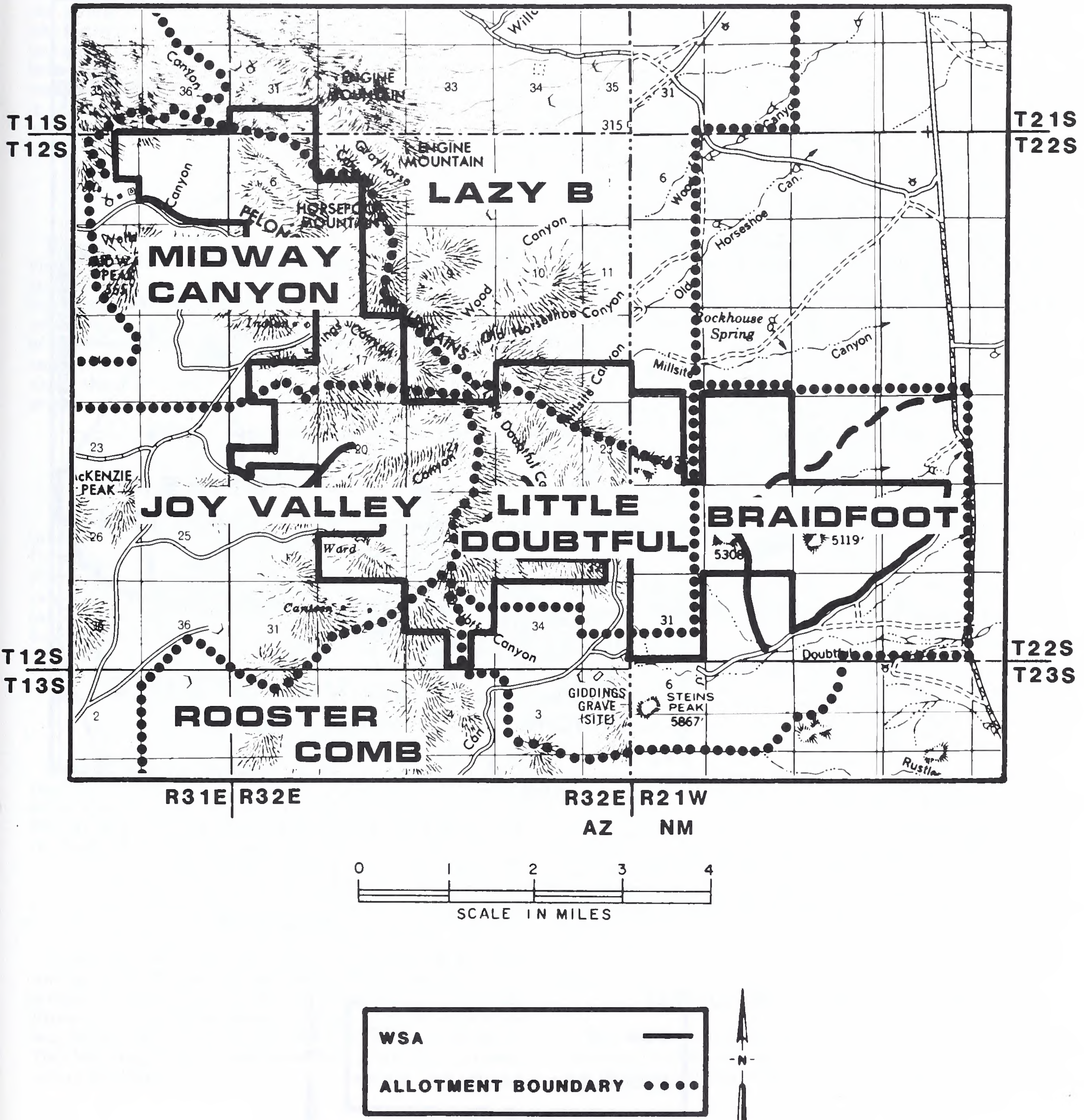

MAP 17

DOS CABEZAS MTNS. 4-65

Grazing Allotments

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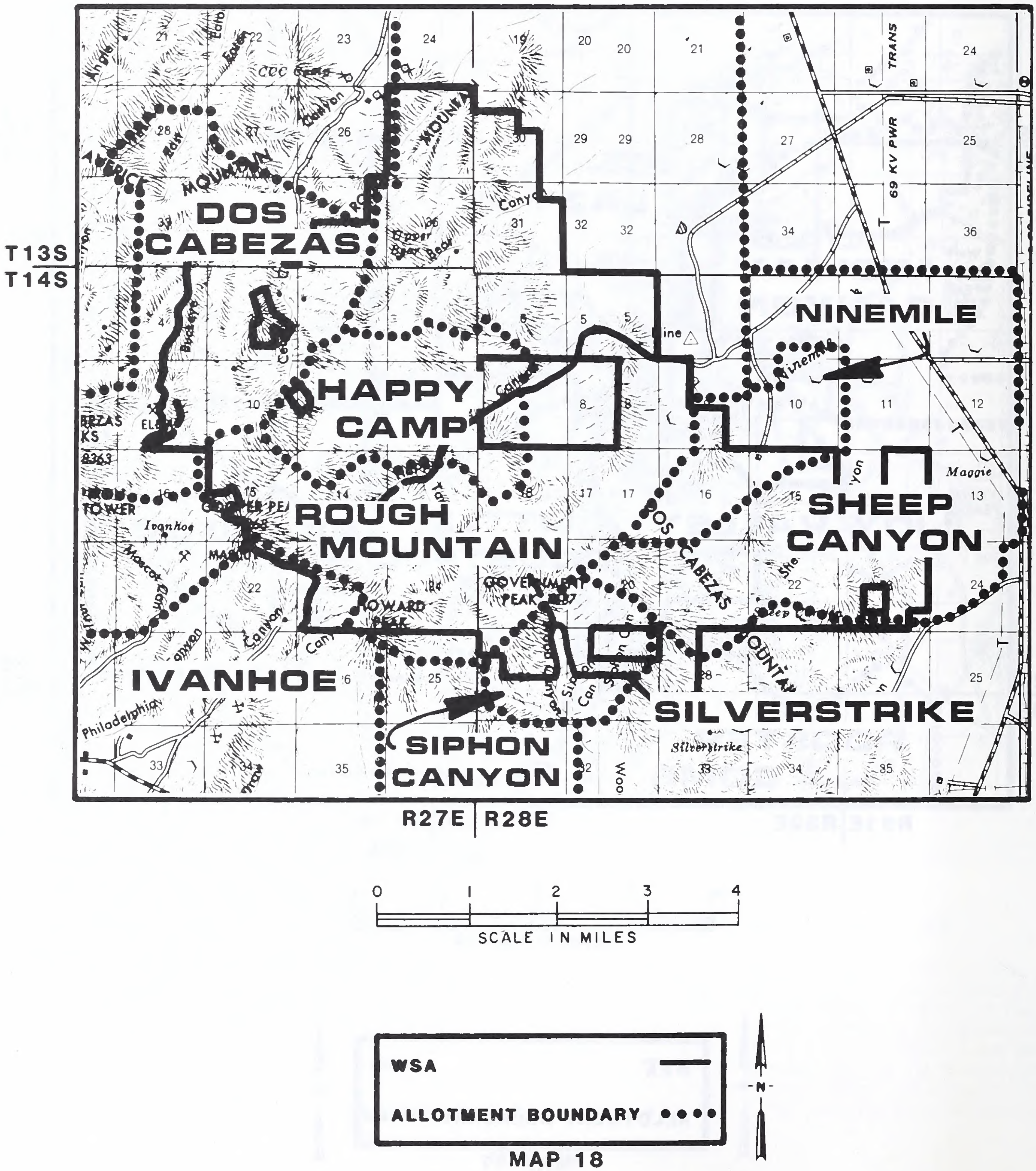

MAP 18

Another activity in all WSAs is off-road vehicle (ORV) use. Because of the rugged topography and poor condition of many of the roads leading to the WSAs, ORVs are often needed for gaining access. Off-road vehicles are closely associated with other recreation activities such as fishing, camping, picnicking, rock collecting and sightseeing.

All WSAs are also suitable for a variety of other primitive recreation activities: horseback riding, hiking, backpacking, camping, rock scrambling and climbing, sightseeing, photography and environmental study. Small but unknown amounts of these activities, when not mentioned below, may occur in the WSAs. Visitor use figures are estimated, based on observation and general knowledge of use in these areas. No formal visitor use statistics have been collected.

NEEDLE'S EYE

Recreation activities are: fishing (about 150 recreation visitor days — RVDs — per year) on the Gila River at both ends of the WSA where vehicular access is available; hunting throughout the WSA, most (about 50 RVDs) near the access roads on either end of the WSA; and a small amount of ORV use (about 50 RVDs) on the vehicle way in the eastern end of the WSA. Access to the way is from a road along the Gila River below Coolidge Dam or from the Reservation to the north.

BLACK ROCK

Recreation activities are: hiking and backpacking, (about 150 RVDs) although most visitors only pass through on their way to the Santa Teresa Wilderness (Coronado National Forest) south of the WSA; hunting (about 75 RVDs) for deer, javelina and quail throughout (access for hiking and hunting is the Black Rock Road north of the WSA); and a small amount of ORV use (about 50 RVDs).

FISHHOOKS

Recreation activities are: deer, javelina and quail hunting (the Gila Mountains are popular with hunters from the Gila Valley) (total annual use in the WSA—about 50 RVDs); and ORV use (about 50 RVDs) on the vehicle ways in the WSA—associated with hunting.

DAY MINE

Recreation activities are: hunting for deer, game birds and javelina throughout the WSA (50 RVDs annually) and a small amount (about 50 RVDs) of ORV use on the fenceline way in the northwestern portion of the WSA and on the way beyond Brushy Tank. Access to these ways is from the Day Mine Road that forms the western and northern boundary of the WSA.

GILA BOX

Recreation activities are: fishing along both rivers (about 750 RVDs annually—access by ORVs in the canyon bottoms and the Gillard Hot Springs road for the eastern portion of the WSA); floatboating when water levels permit, usually from February to May (500 RVDs) (most floating begins on the San Francisco River south of Clifton, Arizona and ends at Bonita Creek just downstream of the WSA); hunting (150 RVDs per year) for deer, javelina, dove, quail and waterfowl; and hiking and backpacking in the river canyons totals about 100 RVDs annually.

The main recreation activity in the WSA is ORV use. ORV use occurs only during periods of low water (usually June to January) and totals as much as 1,000 RVDs a year. Residents of the Safford Valley usually begin at Bonita Creek and travel upstream to Eagle Creek and return in one day. Clifton and Morenci residents usually begin on the San Francisco and travel downstream to Eagle Creek and return the same day. All types of vehicles are used in the canyons — four-wheel drive pick-ups, 3-wheeled ATCs (all terrain cycles), sand rails (buggies) and dirt bikes. The sand rails are most effective in traversing the canyons, where the other vehicles often get stuck. Most evidence of ORV use is washed away during spring runoff.

TURTLE MOUNTAIN

Recreation use includes hunting for deer and game birds (75 RVDs), ORV use of the vehicle ways (50 RVDs) and hiking on the historic Safford-Morenci Trail (100 RVDs annually). The trail passes through the northern part of the WSA, with the east end trailhead just outside the WSA in South Smith Canyon.

JAVELINA PEAK

Recreation activities are: about 50 RVDs of hunting use, primarily for javelina and game birds; and about 1,500 RVDs of year-round ORV use in the dunes in the southern part of the WSA. Access to the dunes is from Haekel and Badger Den Well Roads, WSA boundary roads.

PELONCILLO MOUNTAINS

The primary recreation activity in the WSA is hunting for deer, javelina and quail hunting (about 50 RVDs annually) with about 50 RVDs of ORV use in the flatlands of the eastern portion of the WSA and a small amount of rock collecting (about 50 RVDs) also occurs throughout the WSA.

DOS CABEZAS MOUNTAINS

Recreation activities are: about 100 RVDs of hunting use for deer, javelina and game birds; about 100 RVDs of ORV use on the perimeter of the WSA and in lower Happy Camp

Canyon; and about 50 RVDs of rock collecting. The primary access to the WSA for recreation activities is the road to lower Happy Camp Canyon. The western boundary road along Buckeye Canyon also provides access to the WSA as do roads and ways in Sheep, Silver Strike and Wood Canyons.

WILD AND SCENIC RIVERS

In April 1982, the National Park Service completed a nationwide inventory of significant, relatively natural, free-flowing streams for possible inclusion into the National Wild and Scenic Rivers System (NPS 1982). That inventory included two segments of the Gila River in the Safford District: a 32-mile stretch from Coolidge Dam to the Hayden-Winkelman tailings pond, 12 miles of which form the southern boundary of the Needle's Eye WSA, and a 26-mile stretch centering on the Gila Box, 15 miles of which constitute the principle feature of the Gila Box WSA.

In April 1981, the Apache-Sitgreaves National Forests completed a study to determine the suitability of three segments of the San Francisco River(29 miles) for inclusion in the National Wild and Scenic River Systems (FS 1981). The southern seven miles is administered by the Safford District Three miles of that segment are within the Gila Box WSA. At the conclusion of the study, all 29 miles were not recommended for inclusion in the National Wild and Scenic River System.

LAND USE

This section discusses such issues as land ownership, withdrawals and rights-of-way that might conflict with wilderness management. The major land use, livestock grazing, is common to all WSAs and is discussed in a previous section of this chapter.

NEEDLE'S EYE

Needle's Eye WSA has 9,716 acres of public land with no state or private inholdings. The state land that was once landlocked between the WSA and the San Carlos Indian Reservation was acquired by BLM through land exchange. A 44 kilovolt (kv) steel tower powerline, built in 1928, crosses the WSA from east to west on a 100-foot wide right-of-way. The powerline is surveyed every 90 days by helicopter to determine maintenance needs. Maintenance crews gain access to this line by helicopter, foot or horseback.

Of the four withdrawals in the WSA, three are held for dam and reservoir sites (about 2,600 acres) to produce hydroelectric power. The dams, however, have not been authorized by Congress for construction. The fourth is held by the San Carlos Irrigation Project (about 4,950 acres) for protection of the Gila River watershed (see Map 19).

BLACK ROCK

Black Rock WSA has 8,492 acres of public land with no state or private inholdings. The non-federal minerals (split-estate) that were once in the WSA were acquired by BLM through exchange with the State of Arizona. The main access to the WSA, adjacent private land and the northeastern side of the Santa Teresa Mountains (Coronado National Forest) is the Black Rock Road that crosses 5 miles of the San Carlos Apache Indian Reservation. The Tribe is concerned that wilderness designation of Black Rock would lead to significant increases of visitor use and travel across the Reservation, with increased vandalism, trespass, theft of firewood and similar visitor-related problems.

Since Tribal policy is to restrict non-Indian travel on the Reservation, the Tribe has suggested that wilderness designation and increases in nontribal visitors could cause them to close the Black Rock Road across the Reservation. BLM has presented the situation to the Department of the Interior Field Solicitor for an opinion on whether the Tribe can legally close the road. The Solicitor has stated that since public funds have been spent on maintenance at the road, it is a public road and cannot be closed except by the Commissioner of Indian Affairs for public safety, fire prevention or suppression, fish or game protection or to prevent damages to an unstable roadbed.

FISHHOOKS

Fishhooks WSA has 15,215 acres of public land with no state or private inholdings. The state lands that were within and adjacent to the WSA were acquired by BLM through land exchange.

DAY MINE

Day Mine WSA has 17,309 acres of public land with no state or private inholdings. The state lands that were within and adjacent to the WSA were acquired by BLM through land exchange.

GILA BOX

Gila Box WSA has 17,831 acres of public land with no state inholdings and an 80-acre private inholding that has no access. The private land is being grazed by livestock.

A portion (5,220 acres) of the land covered by a Corps of Engineers (COE) withdrawal application lies within the WSA. This application segregates the land from appropriation under the land and mineral laws for the proposed Camelsback flood control dam and reservoir, authorized by Congress in 1962.

NEEDLE'S EYE

Withdrawals

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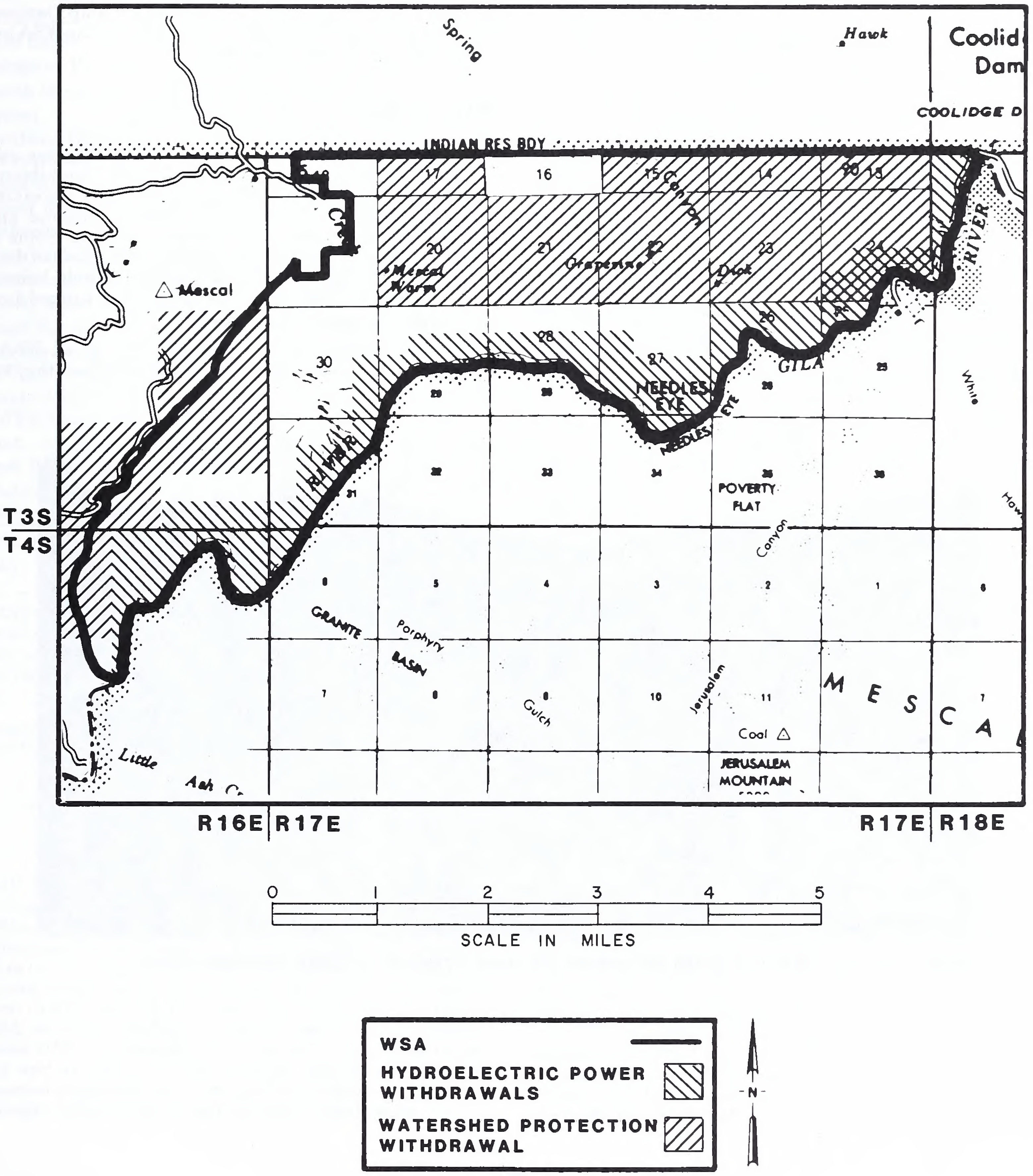


MAP 19

TURTLE MOUNTAIN

Turtle Mountain WSA, with 17,422 acres of public land, has three private inholdings (285 acres) and a state inholding (640 acres). The inholdings are used primarily for livestock grazing. In addition, small portions of two rights-of-way, one for a transmission line and the other for a pipeline, lie along the northern edge of the WSA.

JAVELINA PEAK

Javelina Peak WSA has 18,853 acres of public land with no state inholdings, a 40-acre private inholding and 1,650 acres with non-federal minerals (split-estate). The private inholding is grazed by livestock and has no access but lies within one-quarter mile of a cherrystem road. The northwest boundary of the WSA is formed by a 345-kv powerline right-of-way and the access road.

PELONCILLO MOUNTAINS

Peloncillo Mountains WSA has 12,317 acres of public land with no state or private inholdings but does include 760 acres with non-federal minerals (split-estate). The WSA straddles the state line with 8,256 acres in Arizona and 4,061 acres in New Mexico.

DOS CABEZAS MOUNTAINS

Dos Cabezas Mountains WSA has 18,509 acres of public land with no state inholdings and four private inholdings (258 acres). The 576 acres with non-federal minerals (split-estate) that were once in the WSA were acquired by BLM through exchange with the State of Arizona. The inholdings are currently being used for livestock grazing and have no access. A 960-acre parcel of private land intrudes into the WSA at the lower end of Happy Camp Canyon. This private land is essentially surrounded by the WSA but is accessed by a cherrystem road.

WILDLIFE

The WSAs provide habitat for a variety of game and nongame wildlife, including mammals, birds, amphibians, reptiles and fish. Species are typical of those associated with the desert shrub, mountain shrub, grassland and riparian habitat types of southeastern Arizona. Some of the more common species are mule deer, white-tailed deer, javelina, cottontail rabbit, blacktailed jackrabbit, bobcat, coyote, Gambel's quail, mourning dove, white-winged dove and various migratory waterfowl.

Protected wildlife species probably live in all WSAs. Table 3-9 lists these species, their status and where they are found.

Shrub-grassland vegetation grows throughout the upper elevations of Turtle Mountain WSA.

TABLE 3-9
THREATENED AND ENDANGERED WILDLIFE

Bureau of Land Management
Safford District, Arizona

Species	Listed By[1]	Category[2]	Needle's Eye[3]	Black Rock	Fishhooks	Day Mine	Gila Box	Turtle Mtn.	Javelina Peak	Peloncillo Mtns.	Dos Cabezas Mtns.
Bald Eagle	F, S	E, II	V		V	V	V	V			
Peregrine Falcon	F, S	E, III	P	V			V	V	P	P	P
Loach Minnow	F, S	C, III					V				
Osprey	S	III	P				V				
Northern Beardless Tyrannulet	S	III	P			V				P	
Black Hawk	S	III	V		V	V	V				
Desert Bighorn Sheep	S	III, II (NM)	V	P						V	
Razorback Sucker	F, S	C, III					V				
Mississippi Kite	S	III	P								
Snowy Egret	S	IV	P				V				
Great Egret	S	IV	P				P				
Black-crowned Night Heron	S	IV	P				V				
Black-bellied Whistling Duck	S	IV					P				
Coati	S (NM)	II (NM)								P	
Rock Rattlesnake	S (NM)	II (NM)								P	
Costa's Hummingbird	S (NM)	II (NM)								P	

[1] F — Fish and Wildlife Service; S — Arizona Game and Fish Department and/or New Mexico Department of Game and Fish.

[2] C — Candidate Species; E — Endangered; II — Animals whose continued presence in Arizona is now in jeopardy and extirpation from the State is highly probable if no recovery efforts are made; III — Animals whose continued presence in Arizona is now in jeopardy in the foreseeable future; IV — Animals for which there is a moderate threat to the habitats they occupy; II (NM) — Species whose prospects of survival or recruitment within New Mexico may become in jeopardy in the foreseeable future.

[3] P — Probable; V — Verified.

Source: Arizona Game and Fish Commission, 1982; Fish and Wildlife Service, 1980; New Mexico Department of Game and Fish, 1985.

All the WSAs are included in completed wildlife habitat management plans (HMPs): Needle's Eye and Black Rock WSAs in the Mescal-Dripping Springs HMP, Dos Cabezas Mountains WSA in the Dos Cabezas HMP, and the other six in the Gila-Peloncillo HMP. These HMPs were prepared in cooperation with the Arizona Game and Fish Department (AGFD) and, in the case of the Peloncillo Mountains WSA, with the New Mexico Department of Game and Fish. These HMPs have proposed a variety of measures to protect and enhance wildlife habitat, including fencing of riparian areas and the building of water catchments, small storage tanks, drinkers and spring developments.

Of special interest in all the WSAs is riparian habitat that is well below potential. Reproduction of the broadleaf riparian species (cottonwood, willow, sycamore, ash and walnut) is severely limited because cattle eat the seedlings. The Gila and San Francisco Rivers (Gila Box WSA) have a high potential for producing extensive stands of broadleaf riparian trees, but few are currently regenerating. The other WSAs have smaller but no less significant broadleaf riparian areas that are also not regenerating. All potential broadleaf riparian areas are currently showing a trend toward eventual replacement by riparian scrub species such as mesquite and saltcedar. Maintenance and improvement of the broadleaf riparian component are of crucial importance in providing habitat and in aiding its regeneration. The HMPs are directed toward efforts to restore and re-establish these species to insure maximum acreage of this excellent wildlife habitat.

The following sections discuss species, habitat and projects in the WSAs. No projects are planned in Javelina Peak, Fishhooks or Dos Cabezas Mountains WSAs. The habitat improvement projects identified in the HMPs have been implemented in these WSAs. The HMPs and the projects are being monitored for their effectiveness.

NEEDLE'S EYE

This WSA is bordered by the Gila River that supports catfish, carp, largemouth bass and green sunfish. Long-fin dace are found in the side canyons with permanent water. The AGFD, in cooperation with BLM, has introduced the federally-listed Gila topminnow into the ponds at Mescal Warm Springs.

Livestock exclosures are planned along the Gila River and Mescal Creek. Plantings of cottonwoods and possible saltcedar control are planned in conjunction with the exclosures. The WSA is also an important wintering area for bald eagles and a nesting area for black hawks.

BLACK ROCK

To improve habitat for wildlife, 15 small exclosure fences would be reconstructed around existing ash and cottonwood trees in Black Rock Creek. These fences would be temporary remaining only until the trees were large enough to survive wildlife and cattle damage. Three larger (one to two acre) exclosures would also be built to protect riparian habitat. The area has excellent deer and raptor habitat.

FISHHOOKS

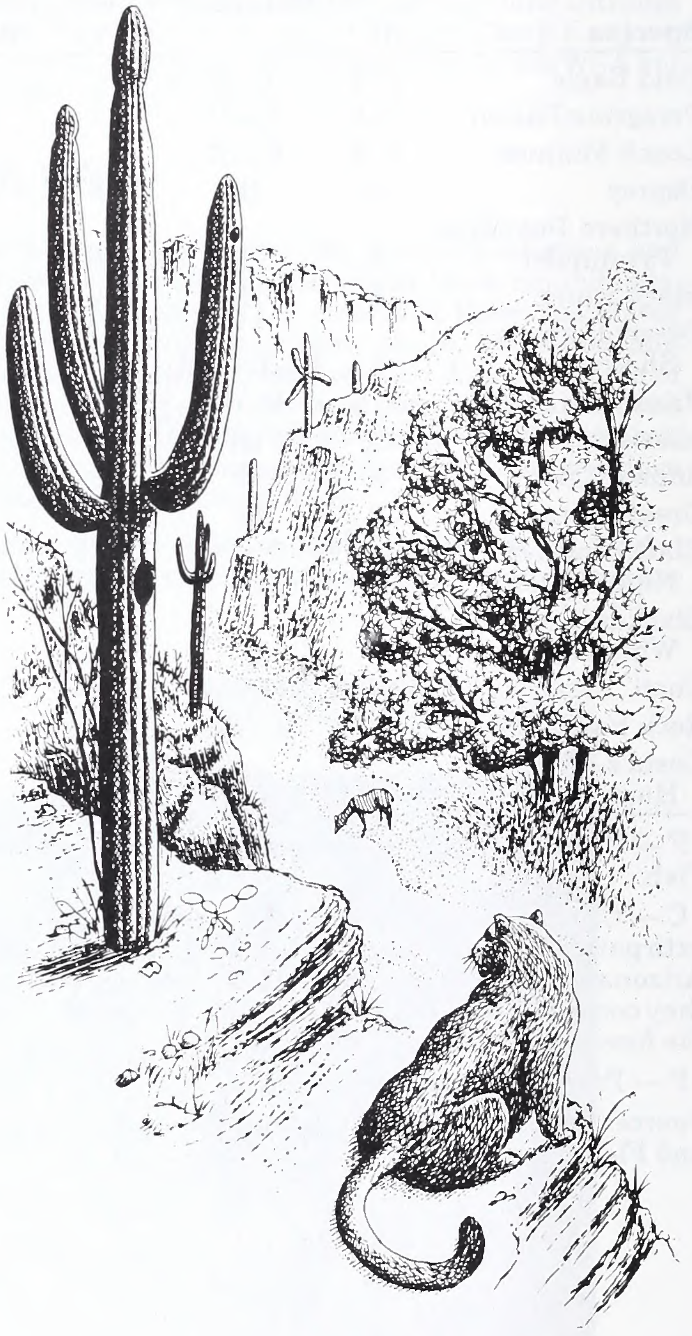
The livestock exclosures planned for lower Fishhook Canyon in the HMP have been constructed.

DAY MINE

Livestock exclosures have been built on the eastern edge of the WSA in the Left Fork of Markham Creek to protect and enhance riparian habitat. This creek has permanent water that supports native fish (long-finned and speckled dace). Black hawks nest in riparian trees in the creek bottom.

GILA BOX

This WSA includes the Gila and San Francisco Rivers that support various catfish, green sunfish, long-finned dace, Gila Mountain sucker and razorback sucker. The razorback sucker, a State-listed species (see Table 3-9), has recently been reintroduced into the Gila River by a joint effort of AGFD and the Fish and Wildlife Service (FWS). BLM, AGFD and FWS have also proposed reintroducing the federally-listed endangered woundfin into the Gila River. Gila Box WSA is an important wintering area for bald eagles.



The Gila and San Francisco Rivers are being fenced (requiring about 5 miles of fence) to manage cattle in the canyon bottoms to protect and improve the riparian habitat. In addition, cottonwoods and willows are being planted and saltcedar may be controlled.

BLM is planting broadleaf riparian trees along the Gila and San Francisco Rivers. The trees are planted in groups of 15 to 20 in a concentrated area and are watered with a drip system fed by a 2,000-gallon tank. Each tree is fenced for protection from cattle and wildlife. A portable pump is used to fill the tank every two weeks from the spring planting to the end of the growing season in the fall. After one to two growing seasons, tree roots will have grown down to the water table and will no longer need drip irrigation. The drip system will be moved to a new location the next growing season, and the process will be repeated. Several tank/drip systems can be operated each growing season if BLM has enough workers to ensure that the tanks are regularly filled. Access for installation and maintenance of the plantings is by helicopter, vehicles, foot, horseback and raft.

The 18 miles of river (36 miles of bank) offer numerous sites where natural revegetation is unlikely because of the height of the bank above the water table. The duration of the planting project will, therefore, be virtually indefinite.

To improve the distribution of threatened and endangered (T&E) species, BLM and AGFD plan to release desert bighorn sheep in the Gila Box. No support facilities will be needed.

TURTLE MOUNTAIN

A 100-acre study exclosure on the Turtle Mountain ridgeline, a spring development and livestock exclosure in Hot Springs Canyon and reconstruction of livestock exclosures in the South Smith Canyon are proposed in the WSA. Other exclosure sites are being evaluated.

JAVELINA PEAK

The two bighorn sheep/wildlife water projects planned for the WSA have been constructed.

PELONCILLO MOUNTAINS

To improve the distribution of T&E species, BLM and AGFD have released desert bighorn sheep in the WSA. A bighorn sheep/wildlife water development planned for the WSA has been constructed.

DOS CABEZAS MOUNTAINS

Two wildlife water developments and a study exclosure planned for in the HMP have been constructed.

CULTURAL RESOURCES

Cultural resources information for the WSAs has been collected from literature/records search inventories (Professional Analysts, in preparation), field sampling inventories (Geronimo Class II Inventory: Kinkade 1975; and BLM 1978) and intensive field inventories (Class III) of BLM and BLM-authorized land use actions. The amount of previous research varies greatly among the WSAs, with inventories in most WSAs covering limited areas or concentrating on a small portion of the WSA. The number of previous surveys in each WSA is shown in Table 3-10.

Data on the known archaeological sites of the WSAs show that the study areas were occupied by peoples as early as 8000 B.C. with intermittent habitation up to the present. Culture groups represented are Cochise, Mogollon, Hohokam, Salado and numerous historic Anglo peoples. Because little research has been completed in the WSAs, the history of the study areas is poorly known.

Prehistoric (pre-A.D. 1700) archaeological remains include permanent habitation sites, temporary camps, sherd and lithic scatters (remains of ceramic vessels and stone tools), cave sites, cliff dwellings, food storage features, rock art sites and single isolated artifacts. Historic (post-A.D. 1700) archaeological remains consist primarily of ranching and mining sites and include the Safford-Morenci Trail (used for commerce).

Not enough data exists to predict the distribution, density or significance of unknown archaeological resources in the WSAs, but some site locations and physiographic landforms have been tentatively correlated. Land next to rivers and major streams and areas with numerous caves and cliff overhangs are expected to have a high prehistoric site density. Higher densities of long-term habitation sites are more likely along rivers, but historic mining sites are more apt to be in high mountain areas. These key areas and the expected site densities in each WSA are shown in Table 3-10.

The number of known cultural resource sites believed to be eligible for listing on the *National Register of Historic Places* is also shown in Table 3-10. Fishhooks and Gila Box WSAs have the highest number of such sites. Peloncillo Mountains WSA has many known prehistoric sites, but only two appear to qualify for nomination to the *National Register*.

The condition of cultural resources ranges from poor to good, but most sites have been disturbed by natural or human actions. The most common impacts have resulted from weathering and erosion, livestock grazing and vandalism.

BLM contacted the San Carlos Apache Tribe concerning possible designation of the nine WSAs. The Tribe expressed their concern that wilderness designation could limit economic development of Reservation lands. They were also concerned that designation would result in increased visitor use across Reservation lands and increased vandalism, theft of natural resources and trespassing. BLM also contacted the Tribe to determine what impact wilderness management would have on the Tribe's rights as guaranteed under the American Indian Religious Freedom Act. No response was received.

PALEONTOLOGICAL RESOURCES

Needle's Eye and Javelina Peak WSAs have known paleontological (fossil) resources. For the seven WSAs that have no known fossils, the potential for finding fossils is unknown. Needle's Eye WSA has numerous invertebrate fossils, notably fussilinids and triticites, throughout the area's limestone beds. These remains have not been studied extensively but are thought not to be significant or

TABLE 3-10
CULTURAL RESOURCES*

Bureau of Land Management
Safford District, Arizona

WSA	AR Sites	HS Sites	NRQ	Surveys	Resource Site Density	Significance	Key Areas
Needle's Eye	2	0	2 AR	8	AR — Mod-High	AR-Mod-High	Gila River, major tributaries, springs
Black Rock	3	2	2 AR	14	AR — High HS — High	AR-High HS-High	Black Rock Wash, major tributaries
Fishhooks	31	0	12 AR	9	AR — High HS — Low	AR-High	Major washes, cliffs
Day Mine	1	0	1 AR	11	AR — Mod HS — Low	AR-Mod HS-Low	Major washes, cliffs
Gila Box	10	6	3 AR 2 HS	9	AR — High HS — Mod	AR-High HS-High	Gila and San Francisco Rivers, Eagle Creek vicinity
Turtle Mountain	2	3	1 AR 1 HS	11	AR — Low HS — Low	AR-Low HS-Low	Major washes, springs, cliffs
Javelina Peak	4	1	2 AR	5	AR — Mod HS — Low	AR-Mod HS-Mod	Mountain cliffs
Peloncillo Mountains	13	0	2 AR	7	AR — High HS — Low	AR-High HS-High	Major canyons, cliffs
Dos Cabezas Mountains	5	0	1 AR	0	AR — High HS — Mod	AR-High HS-High	AR-base of mountains, cliffs, HS-mountains

* As of August 1985
AR — Prehistoric site (pre-A.D. 1700); HS — Historic site (post-A.D. 1700); NRQ — National Register quality sites; Key Areas — Significant, critical or sensitive areas (see Glossary).

Source: Safford District Files

unique. Javelina Peak WSA has two known vertebrate fossil sites, the Whitlock Hills site and the Flowing Well site. The fossils of both sites date from late Pliocene times and include primitive horses, camels and tortoises. A high potential exists for other fossils to be in this WSA.

VISUAL RESOURCES

Visual resource management (VRM) is a process to identify and manage the quality of the visual environment and to reduce the visual impact of development activities. To manage the visual resource, management classes have been developed that describe the degree of landscape modification permissible under each class. Visual resource management classes have been developed for all WSAs in the EIS area through the land-use planning process, and provide the basis for analyzing the expected visual impacts of a proposed land use action. After analysis, mitigating measures may be applied to reduce the visual impacts to a level consistent with the objectives of the VRM class.

The Bureau of Land Management's VRM classes, their objectives, and required management are as follows:

Class I —	Class I provides primarily for natural ecological changes only. It is applied to primitive areas, some natural areas and similar areas where management activities are to be very limited. Any contrast in the characteristic landscape must not attract attention.
Class II —	Changes in any of the basic landscape elements (form, line, color or texture) caused by a management activity should not be evident in the characteristic landscape. Contrasts are seen, but must not attract attention.
Class III —	Changes caused by a management activity may be evident in the characteristic landscape, but the changes should remain subordinate to the visual strength of the existing landscape.

Class IV —	Changes caused by a management activity attract attention and may be dominant features of the landscape in terms of scale, but the changes should repeat the form, line, color and texture of the characteristic landscape.
Class V —	Change is needed. This class applies to areas where the natural character has been disturbed to a point where rehabilitation is needed to bring it back into character with the surrounding countryside.

During the wilderness review, all nine WSAs are being managed as VRM Class II areas, unless previously identified as Class I. The WSAs designated as wilderness will be managed under VRM Class I objectives. If a WSA is not designated wilderness, it will return to and be managed under the VRM classes shown in Table 3-11.

FIRE MANAGEMENT

Few fires have recently occurred in the EIS area (less than five to seven fires per WSA in the last 25 years). Fires seldom burn more than 30 acres and often burn themselves out before having to be suppressed. The size and behavior of most fires depends largely on the amount of precipitation and the time of year it is received. Annual grasses, the primary source of wildfire fuel in the district, grow as a result of above-average precipitation during the winter and spring.

The Safford District operates under a modified fire suppression plan (BLM 1982b), under which fire suppression may vary depending on the difficulty of fire control and the values threatened. The district attempts to keep resource damage from fire suppression to a minimum through the use of retardant drops, helitack crews, ground pumpers and fire crews rather than operation of heavy equipment such as bulldozers.

The management of fire will be addressed in the fire management plan for each wilderness area. The plan, to be developed after designation, will cover the following aspects of fire management: wilderness management objectives for the area, historic fire occurrence, natural role of fire, proposed degree of suppression, expected fire behavior, acceptable suppression techniques, smoke management, prescribed fire and effects of adjacent lands. It is not anticipated that fire management in designated wilderness will be significantly different from present fire management practices.

ECONOMIC CONDITIONS

This section discusses economic conditions within Gila, Graham and Greenlee Counties, Arizona—the area expected to be most heavily influenced by wilderness designation. All but one of the WSAs lie within a 50-mile radius of Safford, the seat of Graham County and a trade center for eastern Arizona and western New Mexico. The remaining WSA is relatively close to Globe, seat of Gila County and a mining and tourist center. These communities, the largest in the area, generally lie near the point of destination for visitors from outside the area.

TABLE 3-11
VRM CLASSIFICATION BEFORE WILDERNESS REVIEW

Bureau of Land Management
Safford District, Arizona

		VRM Class Acres*		
WSA	WSA Acres	Class I	Class III	Class IV
Needle's Eye	9,716	9,716	0	0
Black Rock	8,492	8,492	0	0
Fishhooks	15,215	6,730	0	8,485
Day Mine	17,309	1,630	0	15,679
Gila Box	17,831	15,667	0	2,164
Turtle Mountain	17,422	3,620	0	13,802
Javelina Peak	18,853	9,520	0	9,333
Peloncillo Mountains	12,317	5,600	0	6,717
Dos Cabezas Mountains	18,509	5,822	2,240	10,447
Total	135,664	66,797	2,240	66,627

* None of the WSAs were managed as Class II or V before the wilderness review.

Source: Safford District Files.

GILA COUNTY

Employment in Gila County, including proprietorship (privately-owned businesses) and wage and salary workers (both full and part time), totaled 14,686 in 1981. This group has a total personal income of $279.3 million. Salaried non-farm workers represent 91 percent of the labor force (13,419). Mining is the dominant industry, employing 37 percent of the salaried workers in the mineral extraction (2,855) and manufacturing (copper processing —2,149). In 1981 mining contributed $152 million in wages and salaries to the economy. In services sector in the next most important employer, providing 20 percent of salaried non-farm jobs. The state and local government and retail trade sectors rank forth and fifth in importance, employing 2,162 and 1,824 workers respectively and contributing $27.8 million and $18.2 million of income respectively to the county. The remaining employment sectors — federal government, civilian, construction, transportation and utilities, finance, insurance and real estate, military, wholesale trade and agricultural serves — account for 12 percent of the work force and 13 percent of the paid wages.

Agricultural proprietorships totaled 168 and one percent of the total county employment and earned slightly over $20 million (Bureau of Economic Analysis 1983). Out of these 168 operations, 80 were classified as ranchers (Arizona Agricultural Statistics 1982, Arizona Crop and Livestock Reporting Service, U.S. Department of Agriculture). Collectively these ranchers run about 22,900 livestock.

Economically, Gila County is slightly less well off than Arizona as a whole. County per capita income in 1981 amounted to $9,283 or $588 below the state average. This same relationship has remained relatively constant over the past 12 years (Valley National Bank of Arizona 1976; 1983). Unemployment from 1970 to 1983 averaged 10.1 percent as compared to the state average of 6.6 percent. The unemployment rate betweem the end of 1983 and February 1984 has ranged from 17.9 to 14.3 percent, while the state unemployment has ranged from 6.3 to 5.7 percent (Arizona Department of Economic Security 1970-1984). The high dependence of the economy on a single industry (mining) has contributed significantly to the high unemployment rate.

GRAHAM COUNTY

Total, full and part time, employment for Graham County in 1981 amounted to 6,084 and the associated personal income slightly exceeded $78 million. About 80 percent of all workers were employed in non-farm wage and salary jobs. State and local governments are the county's main employer, providing jobs for 1,522 (31.4 percent) salaried workers. Retail trade and services are the second and third most important employers with 1,266 and 837 employees respectively. These workers earned $13.6 million and $9.8 million respectively. The remaining industries in order of importance are construction, manufacturing, federal employment, transportation and utilities, finance, insurance, real estate, mining, agricultural services and military. These industries make up slightly more than 25 percent of the salaried employment opportunities in the county.

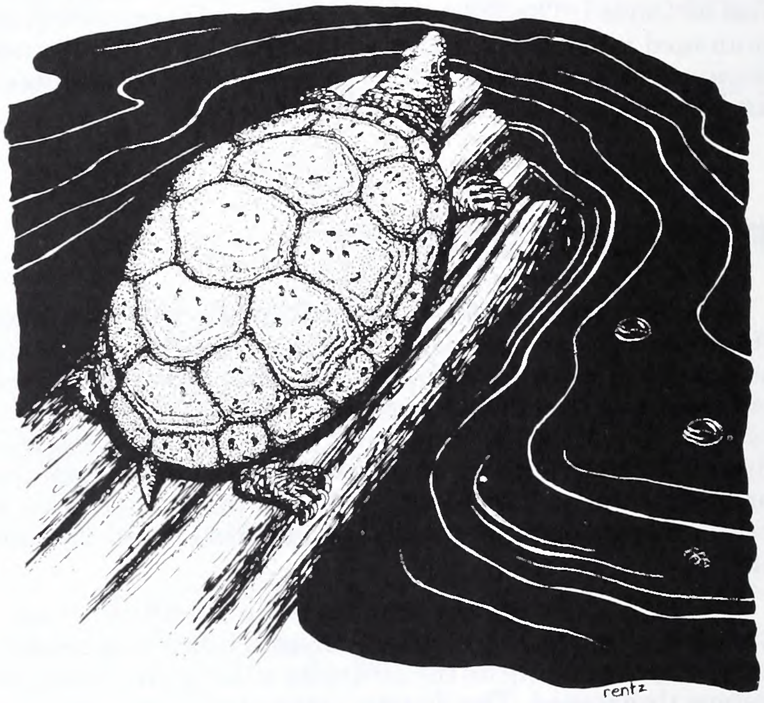
Graham County had 431 farm proprietorships in 1981, involving seven percent of all the county's employment. Personal income for this sector amounted to $7.1 million (Bureau of Economic Analysis 1983). Of the total agricultural proprietors, 128 ran cattle (Arizona Agricultural Statistics 1982, Arizona Crop and Livestock Reporting Service, U.S. Department of Agriculture). These ranchers ran 13,600 livestock.

Contrasting the economic climate of Graham County with that of Arizona shows that on the average the county is significantly less well off than the state. In 1981 Graham County's per capita income was $6,185 — $3,686 below the state average. County per capita income averaged $1,828 below the state average from 1970 to 1981 (Valley National Bank of Arizona 1976, 1983).

Between 1970 and 1983 unemployment in Graham County averaged 10.3 percent, 3.7 percent higher than the state average for the same period. Unemployment from the end of 1983 to February 1984 ranged from 10.0 to 11.4 percent (Arizona Department of Economic Security 1970-1984). Although Graham County has little mining, it serves as a trade center for mining areas and is also suffering because of unemployment in mining.

GREENLEE COUNTY

Employment in Greenlee county totaled 4,768 in 1981, contributing slightly over $118.6 million in income. Non-farm wages and salary employment made up 92 percent of the total work force. The primary employment stimulus is mineral based, including both mining and manufacturing (copper processing). Collectively these two sectors employ 70 percent of the salaried employees and earn $97.5 million in income. State and local government rank second by number of employed and third by income contributions, employing 12.0 percent of the county's salaried workers. Retail trade employs 6.8 percent of the salaried workers, and the services sector employs 4.1 percent. These two sectors earn $4.9 million in personal income ($3.2 million and $1.7 million respectively).



Construction, transportation and utilities, finance, insurance, real estate, civilian federal government, military, agricultural services and wholesale trade are the remaining sectors in order of importance for non-farm wage and salary workers. In 1981 these sectors contributed slightly over seven percent of the remaining employment. Farm proprietors represented 4.3 percent (205) of the total employment (Bureau of Economic Analysis 1983). Sixty-two were classified as ranchers (Arizona Agricultural Statistics 1982, Arizona Crop and Livestock Reporting Service). These operators ran 13,200 livestock.

Over the long term, Greenlee County has been better off economically than Arizona as a whole. In 1981 personal per capita income for the county was $9,952 as compared to $9,871 for the State. The difference between average incomes for the county and the State between 1970 and 1981, however, was about $100 (Valley National Bank of Arizona 1976, 1983).

Average unemployment between 1970 and 1983 for Greenlee County amounted to 7.5 percent as compared to 6.6 percent for Arizona. County employment from the end of 1982 to February 1984 ranged from 6.5 to 7.1 percent, while state employment during the same period has ranged from 6.3 to 5.7 percent (Arizona Department of Economic Security 1970-1984). The dependency of the economy upon a single industry — mining — is apparent from the unemployment statistics. The current economic situation has had the most serious effect upon the copper industry since 1973, and a large portion of the unemployment has occurred in mining.

EIS AREA

The major land use of each WSA is livestock grazing. Table 3-7 shows the number of allotments in each WSA and the number of livestock using the WSAs (in Animal Unit Months — AUM). In determining annual income, each AUM is valued at $5.00. In terms of overall ranch value, an animal unit is worth about $1,500. See Table 3-12 for annual income and ranch value by allotment and WSA.

There are other public land uses that contribute in varying degrees to the economy of the counties. Mining claims are present in all WSAs except Turtle Mountain, Javelina Peak and Peloncillo Mountains and oil and gas leases have been filed in Peloncillo Mountains and Dos Cabezas Mountains WSAs. Powerlines are within or adjacent to Needle's Eye, Turtle Mountain and Javelina Peak WSAs and recreational activities are ongoing in each WSA. More recreation use occurs in Gila Box WSA because of floatboating during spring runoff and ORV use throughout the rest of the year during low water. Recreation use levels are discussed in the Recreation section of this chapter. For purposes of determining economic impacts associated with recreation use, each recreation visitor day (RVD) is valued at $15.00 (Derived from Bureau Census 1980b). See Table 3-13 for gross sales attributable to recreation use of the WSAs in the EIS area.

SOCIAL ELEMENTS

This section discusses the social elements of population and public attitudes and perceptions. The nine WSAs analyzed in this EIS area lie in parts of five counties (Graham, Greenlee, Gila and Cochise, Arizona and Hidalgo, New Mexico) and seven census county divisions (CCDs). Table 3-14 shows WSAs by county and CCD. Map 20 shows the locations of the counties and the CCDs.

The social elements addressed in this section are discussed on the CCD, county and State levels. The public attitudes and perceptions were acquired through interviews of residents of southeastern Arizona and southwestern New Mexico.

POPULATION

Table 3-15 shows population data by CCD and county. Data is displayed for the years 1970 and 1980 and projected to the year 2000. No projections have been made for the North Hidalgo CCD or Hidalgo County, New Mexico.

PUBLIC ATTITUDES AND PERCEPTIONS

BLM obtained most of the information on public attitudes and perceptions through interviews with CCD residents. Residents generally believe that enough wilderness already exists and that more is not needed. They are particularly concerned about conflicts with mineral development. Moreover, they do not want an influx of outsiders to "their lands" and can see no real benefits to be derived from wilderness.

Winkelman CCD residents oppose wilderness, fearing impacts to mining. They are highly interested in outdoor recreation, especially ORV use and picnicking, but they are not wilderness oriented.

Residents of the Pima CCD revealed no real position for or against more wilderness. They feel that decisions will be made regardless of their ideas. They are skeptical of the land management policies of BLM and the Forest Service and feel that in the decision-making process these agencies ignore the knowledge and experience of residents of affected areas.

Residents of the Safford and Clifton CCDs feel enough wilderness exists, no more is needed and wilderness use is limited to a few individual. Although they did not comment on specific WSAs, they feel mineral resources should remain open to mining. They had trouble associating any benefits with additional wilderness and questioned BLM's ability to manage wilderness areas. They were also aware of the costs of wilderness review and management.

Residents of the Bowie CCD feel adequate wilderness already exists. They see no benefits of more wilderness and feel wilderness designation might lead to problems. In interviews they stated they did not want an influx of outsiders to "their lands."

Arizona residents perceive the Safford District's WSAs in three general ways: 1) most don't know specifically about the WSAs, 2) some support wilderness designation and 3) some oppose wilderness designation. Residents of the CCDs involved do not generally support additional wilderness, but attitudes in Tucson and Phoenix are more balanced between support for and opposition to wilderness.

A region established for consideration of the social elements is defined by Nogales, Arizona on the southwest; Flagstaff, Arizona on the northwest; Albuquerque, New Mexico on the northeast; El Paso, Texas on the southeast; with the interstate highways and international border connecting the cities. Any assessment of the perceptions of regional residents concerning the Safford District and its WSAs must consider that many national forests, parks and wilderness areas already exist within the region. This assessment suggests the region's residents may not have specific knowledge or interest in the Safford District WSAs. As in the State of Arizona, attitudes of the residents of the region represent the broad spectrum from support to opposition for wilderness designation.

ARIZONA WILDERNESS PUBLIC OPINION SURVEY (BLM 1983)

In August 1982, the Arizona State Office of the BLM mailed out 5,535 questionnaires to a sample of Arizona

TABLE 3-12
ANNUAL INCOME AND RANCH VALUE BY ALLOTMENT

Bureau of Land Management
Safford District, Arizona

WSA	Allotment	Net Annual Income ($)	Ranch Values ($)	
			Total*	WSA**
Needle's Eye	Mescal Mountain	5,305	157,500	135,750
	Christmas	425	88,500	10,625
Black Rock	Black Rock	485	99,000	12,125
	Spenazuma/Holdup Cyn.	2,855	100,500	71,375
	Jackson Mountain	1,045	100,500	26,125
Fishhooks	Diamond Bar	4,500	525,000	115,750
	Tom Springs	1,325	145,500	33,125
	Day Mine	600	459,000	15,000
Day Mine	Day Mine	5,230	459,000	139,750
Gila Box	Twin C	785	262,500	19,625
	County Line	1,200	210,000	30,000
	Gila	395	19,500	9,785
	Zorilla	1,915	234,000	47,875
	Smuggler Peak	990	126,000	24,750
	Morenci	540	112,500	13,500
	Bull Gap Community	825	156,000	20,625
	Turtle Mountain	2,935	408,000	73,375
Turtle Mountain	Bonita Creek	2,100	430,500	52,500
	Bull Gap Community	2,475	156,000	61,875
	Turtle Mountain	9,140	408,000	228,500
Javelina Peak	Hackberry	575	645,000	16,625
	Tanque	2,780	247,500	71,750
	Badger Den	150	216,000	3,750
Peloncillo Mountains	Lazy B	435	3,367,500	10,875
	Little Doubtful	2,460	60,000	60,000
	Braidfoot	1,980	73,500	49,500
	Midway Canyon	930	55,500	23,250
	Joy Valley	1,175	351,000	29,375
	Rooster Comb	0	124,500	1,245
Dos Cabezas Mountains	Ivanhoe	50	54,000	1,250
	Happy Camp	0	24,000	19,920
	Sheep Canyon	1,635	70,500	40,875
	Rough Mountain	3,000	135,000	90,000
	Siphon Canyon	360	7,500	9,000
	Silverstrike	300	70,500	7,500
	Dos Cabezas	1,750	109,500	43,750
	Nine Mile	0	3,000	7,500

* Value of the total ranch.

** Value of that part of the ranch in the WSA.

Source: Safford District Files.

registered voters to find out about people's perceptions of federal wilderness. Responses to some of the questions in the survey are summarized by four types of population units: local EIS area, county, region and state. The local EIS area is defined by census county division and zip codes within Greenlee, Graham, Gila and Cochise Counties. The county includes respondents of Gila, Graham, Greenlee, Cochise, Pinal and Pima Counties. The region includes respondents of eastern Arizona, east of Interstate 10 and 17, south of the Navajo Reservation and north of the Mexican border. The statewide population unit includes only the State of Arizona, even though the EIS area does extend into New Mexico. Zip codes are used as the basis for defining the local EIS area.

RESPONSE RATE DATA. BLM mailed 5,535 questionnaires to randomly selected registered voters. Of these questionnaires, 663 could not be delivered. More than 62 percent (3,034) of 4,872 questionnaires delivered were completed and returned to BLM. Table 3-16 summarizes the total number of usable responses, questionnaires received but not answered, unusable responses and undeliverable questionnaires, by population unit.

The data summarized in Table 3-17 show the contrast between the respondents of the local EIS area and the county, regional or statewide respondents. Most respondents of the local EIS area felt Arizona had too much federal land, Arizona should not have more wilderness and new wilderness was not more important than new mines. Most respondents of the counties, region and state responded differently than the local EIS area residents. To the statement, "Arizona has enough wilderness right now", most respondents of the local EIS area, county, region and State agree.

Most respondents of all population units felt ranchers, mining companies and ORV users would lose if an area became wilderness. Most respondents of all population units felt children, rural residents and city residents would benefit from wilderness designation (see Table 3-18).

TABLE 3-13
GROSS SALES ATTRIBUTABLE TO RECREATION USE BY WSA

Bureau of Land Management
Safford District, Arizona

WSA	Total Annual Recreation Use (RVDs)	Value — Annual Gross Sales ($)
Needle's Eye	250	3,750
Black Rock	275	4,125
Fishhooks	100	1,500
Day Mine	100	1,500
Gila Box	2,500	37,500
Turtle Mountain	225	3,375
Javelina Peak	1,550	23,250
Peloncillo Mountains	150	2,250
Dos Cabezas Mountains	250	3,750

Source: Safford District Files

TABLE 3-14
WSA LOCATION BY COUNTY AND CENSUS COUNTY DIVISION

Bureau of Land Management
Safford District, Arizona

WSA	County	CCD
Needle's Eye	Gila	Winkelman
Black Rock	Graham	Pima
Fishhooks	Graham	Pima
Day Mine	Graham	Pima
Gila Box	Graham	Safford
	Greenlee	Clifton
Turtle Mountain	Graham	Safford
	Greenlee	Clifton
Javelina Peak	Graham	Safford
Peloncillo Mountains	Graham	Safford
	Greenlee	Duncan
	Cochise	Bowie
	Hidalgo	North Hidalgo
Dos Cabezas Mountains	Cochise	Bowie

Source: Bureau of the Census 1971; 1981b.

TABLE 3-15
POPULATION BY CENSUS COUNTY DIVISION AND COUNTY

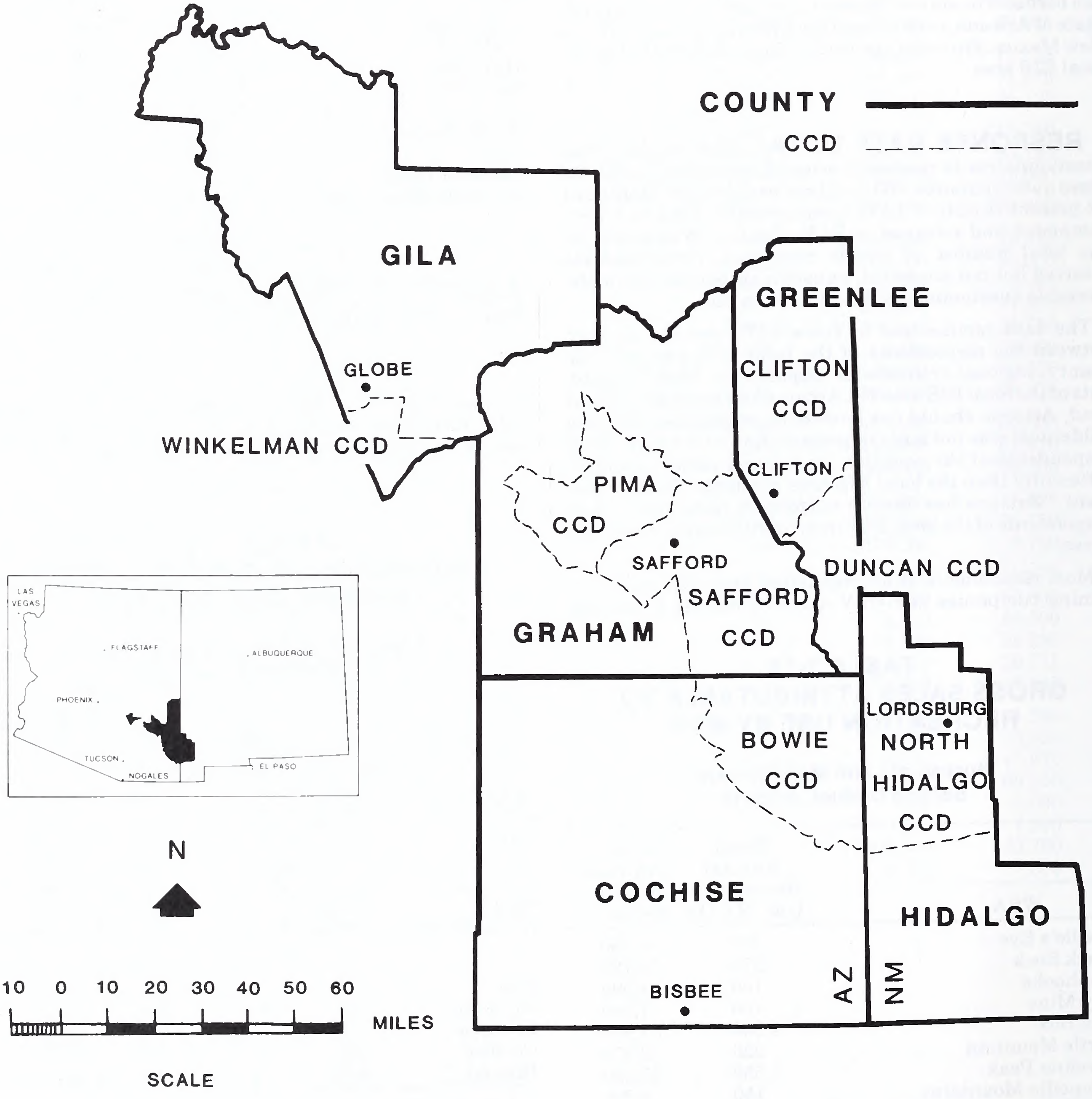
Bureau of Land Management
Safford District, Arizona

CCD		1970	1980	Projected 2000*
CENSUS COUNTY DIVISIONS				
Winkelman	(Gila)	2,518	2,594	3,525
Pima	(Graham)	2,243	2,783	3,721
Safford	(Graham)	11,341	15,986	21,373
Clifton	(Greenlee)	8,298	8,872	11,196
Duncan	(Greenlee)	2,032	2,534	3,198
Bowie	(Cochise)	1,273	1,469	2,132
North Hidalgo	(Hidalgo)	4,368	4,714	No projection
COUNTY				
Gila	AZ	29,255	37,080	50,400
Graham	AZ	16,578	22,862	30,600
Greenlee	AZ	10,300	11,406	14,400
Cochise	AZ	61,918	85,686	124,300
Hidalgo	NM	4,734	6,049	No projection

* Assumes same population distribution throughout the county.

Source: Bureau of the Census 1971; 1981b.

EIS AREA COUNTIES AND CCDS



MAP 20

TABLE 3-16
RESPONSE DATA, SUMMARY

Bureau of Land Management
Safford District, Arizona

Responses	State Total	Regional Total	County Total	Local EIS Area
Total Number of Usable Responses (Actual)	2,881	1,850	787	230
Questionnaires Received But Not Answered	1,838	1,161	568	137
Unusable Responses	153	89	39	9
Undeliverable Questionnaires	663	434	186	31
Total	5,535	3,534	1,580	407

Source: Arizona Wilderness Public Opinion Survey — BLM 1983.

TABLE 3-17
RESPONSES TO STATEMENTS IN ARIZONA WILDERNESS SURVEY

Bureau of Land Management
Safford District, Arizona

Statement/Response	State Total	Regional Total	County Total	Local EIS Area
"Arizona has too much federal land"				
Agree (percents)	42%	41%	42%	56%
Disagree	41%	41%	42%	27%
No opinion	17%	18%	16%	17%
"Arizona should have more wilderness"				
Agree (percents)	47%	46%	46%	35%
Disagree	35%	36%	38%	52%
No opinion	18%	18%	16%	13%
"Federal lands should be given to Arizona"				
Agree (percents)	37%	37%	38%	48%
Disagree	44%	43%	43%	33%
No opinion	19%	20%	19%	19%
"New wilderness is more important than new mines"				
Agree (percents)	42%	43%	42%	27%
Disagree	39%	39%	42%	59%
No opinion	18%	18%	16%	14%
"Easterners want wilderness more than Arizonans"				
Agree (percents)	31%	32%	36%	50%
Disagree	42%	41%	38%	22%
No opinion	27%	27%	26%	28%
"Arizona has enough wilderness right now"				
Agree (percents)	44%	44%	45%	62%
Disagree	36%	36%	36%	33%
No opinion	20%	20%	19%	15%

Source: Arizona Wilderness Public Opinion Survey — BLM 1983.

These results of the survey illustrate that those who responded to the questionnaire were divided in their opinions about wilderness. Generally the respondents of the local EIS area are more strongly opposed to wilderness than respondents of the county, region and statewide population units.

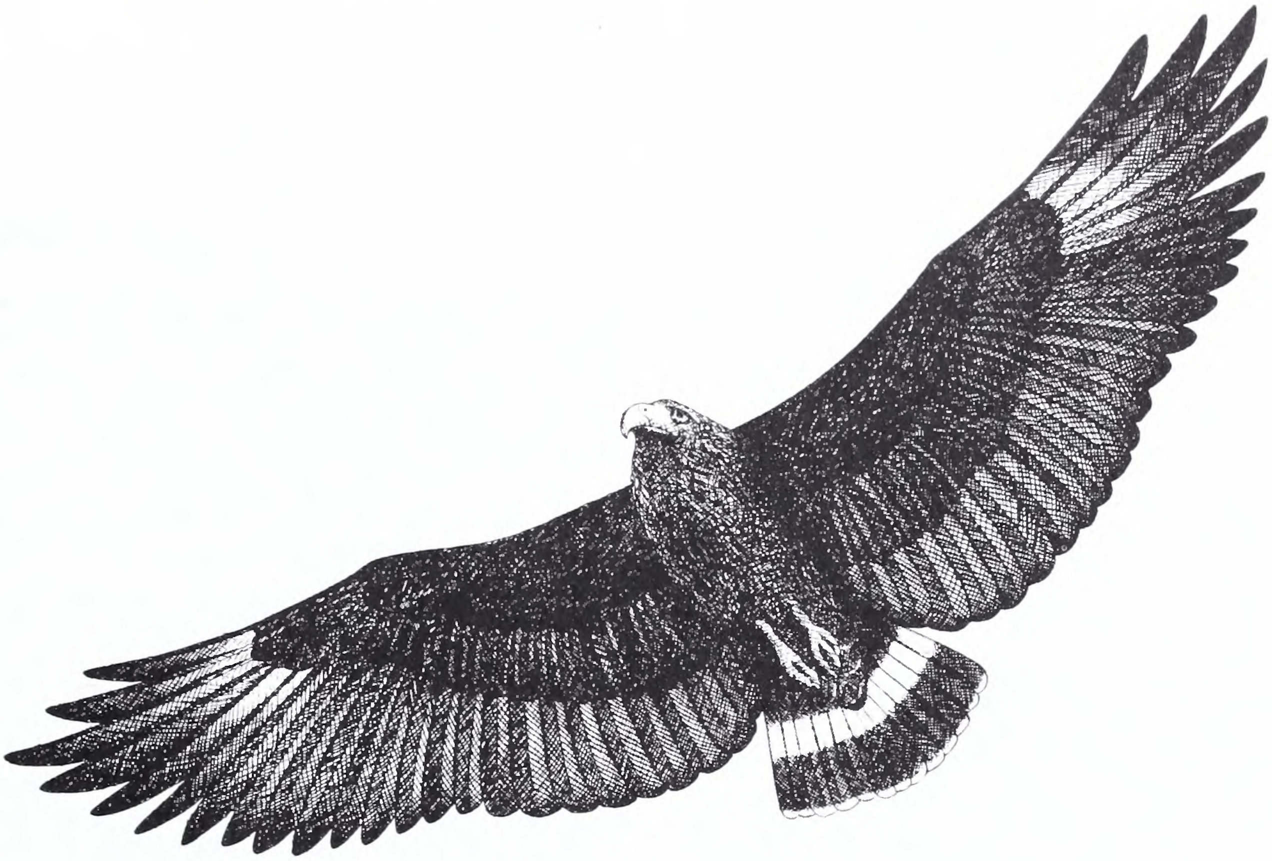
TABLE 3-18
OPINIONS EXPRESSED IN ARIZONA WILDERNESS SURVEY

Bureau of Land Management
Safford District, Arizona

Opinion	State Total	Regional Total	County Total	Local EIS Area
"Effects of wilderness on ..."				
"Ranchers"				
Gain	31%	29%	28%	21%
No Change	11%	11%	11%	10%
Lose	46%	49%	51%	59%
No Opinion	12%	11%	10%	10%
"Mining Companies"				
Gain	13%	12%	11%	9%
No Change	8%	8%	10%	12%
Lose	66%	67%	67%	68%
No Opinion	13%	13%	12%	12%
"ORV Users"				
Gain	19%	18%	17%	13%
No Change	8%	9%	8%	8%
Lose	56%	56%	58%	62%
No Opinion	17%	17%	17%	17%
"Children"				
Gain	67%	65%	63%	48%
No Change	11%	12%	12%	17%
Lose	7%	8%	11%	18%
No Opinion	15%	15%	14%	17%
"Rural Residents"				
Gain	43%	44%	41%	28%
No Change	22%	22%	22%	21%
Lose	19%	18%	23%	36%
No Opinion	16%	16%	14%	15%
"City Residents"				
Gain	53%	52%	52%	38%
No Change	21%	21%	21%	24%
Lose	10%	11%	12%	20%
No Opinion	16%	16%	15%	18%

Source: Arizona Wilderness Public Opinion Survey — BLM 1983.

Diamond Bar Peak dominates the upper reaches of Steer Springs Canyon in Fishhooks WSA.



Chapter 4

ENVIRONMENTAL CONSEQUENCES

CHAPTER 4

ENVIRONMENTAL CONSEQENCES

INTRODUCTION

Chapter 4 analyzes the environmental consequences of each alternative including the *Proposed Action* for each WSA. The amount of information presented for each resource may vary depending on the degree of impact expected but the degree of analysis devoted to each alternative in this EIS will be equal. The interdisciplinary team determined that no measurable impacts would occur to topography, soil, climate or fire management. These resources will not be discussed in this chapter.

Issue No. 4 (See Chapter 1), the impact of wilderness management on construction of a flood control dam was left unresolved. This issue was not analyzed because the BLM does not expect the dam to be built in the Gila Box WSA. The Camelsback site is not being considered by the Bureau of Reclamation for water storage purposes and while the Corps of Engineers is considering it as a possible flood control site, it is not their preferred alternative. For these reasons, implementation is unlikely and this analysis assumes Camelsback Dam will not be built (see Assumption No. 7 for further discussion).

The *Proposed Action*, alternatives and mitigating measures comply with the provisions of *Executive Orders 11988, Floodplain Management and 11990, Protection of Wetlands*. Table 4-1 shows the WSAs and acreages that would be designated under each alternative.

ASSUMPTIONS

The impact analysis was based on the following assumptions:

1. WSAs will be managed according to BLM's *Interim Management Policy* (BLM 1979a) until Congress determines whether they should be designated wilderness.

2. WSAs not designated wilderness will be managed according to existing land use plans, consistent with applicable laws and regulations. Specific management actions for each WSA are described in Chapter 2.

3. WSAs designated wilderness will be managed according to BLM's *Wilderness Management Policy* (see Appendix No. 2).

4. Livestock, wildlife and other facilities may be installed and maintained by traditional methods if site-specific environmental assessments show wilderness resources will not be impaired.

5. BLM will manage designated wilderness areas by visual resource management Class I objectives, where natural ecological changes take place and only very limited management activity is allowed. Any change in the landscape will not attract attention.

6. Changes in numbers of livestock will be made as a result of revisions in the normal grazing and land management planning process, giving consideration to range condition and wilderness values.

7. The Camelsback Dam will not be analyzed in this EIS. The dam was authorized for construction in 1962 but funding has never been appropriated. The Bureau of Reclamation (BuRec) and the Corps of Engineers (COE) are examining possible flood control and water supply needs of the Upper Gila River Watershed in eastern Arizona and western New Mexico. In recent discussions, BuRec has indicated that they do not regard Camelsback as an alternative because the geologic structure of the dam site has poor retention qualitites (seepage). In addition, BuRec has found that the size of the dam must be limited so the reservoir would not flood the town of Clifton. The life of the project, therefore, is shortened because the smaller pool area will fill in faster with sediment than if the dam and reservoir could have been larger. The COE has included the Camelsback Dam as an alternative in their flood control study but in discussion with them, they indicate it is not their preferred alternative because the benefits do not appear to justify the cost. The COE will make their final recommendation in September 1987. For these reasons, implementation is unlikely and this analysis assumes Camelsback Dam will not be built.

The environmental impacts of dam construction are not being overlooked. The COE is analyzing the impacts of their flood control alternatives. Congress will have both the COE study and the BLM wilderness study to review and consider in reaching a decision about wilderness designation or a dam.

8. Any area designated wilderness will be withdrawn from use under the mining and mineral leasing laws as of the date of designation, subject to valid existing rights.

9. State or private land inholdings in an area designated wilderness may be acquired by BLM through purchase or exchange if the landowners agree to the acquisition. In any event, BLM will permit adequate access to inholdings.

10. BLM will manage wilderness areas by Class II air quality standards rather than the more restrictive Class I standards. Class II allows for moderate deterioration associated with moderate, well controlled industrial and population growth.

11. BLM will have adequate funds and personnel to manage areas designated wilderness.

IMPACT-PRODUCING FACTORS

Chapter 2 describes the management actions that would occur in each WSA under each alternative. These actions are the primary impact-producing factors that would cause the environmental impacts discussed in this chapter. The following identifies the impact-producing factors for each WSA. A more detailed discussion appears in Chapter 2.

NEEDLE'S EYE

The primary impact-producing factors under the *Proposed Action* and *Moderate Wilderness* include designation of wilderness; low-level, military training overflights; livestock grazing including increased livestock use, construction of 4 miles of fence and maintenance of existing range facilities; mineral and energy withdrawal; ORV closure; increased non-motorized recreation use; maintenance of an existing 44 kv powerline and upgrading of that line to 69 kv; and construction and maintenance of livestock exclosures and introduction of native fish to Mescal Creek and adjoining springs.

The primary impact-producing factors under *All Wilderness* and *Enhanced Wilderness* would be the same as under the *Proposed Action* and *Moderate Wilderness* except that the entire WSA would be designated wilderness and closed to mineral, energy and ORV use.

TABLE 4-1
WSAs BY ALTERNATIVE*

Bureau of Land Management
Safford District, Arizona

Alternatives	WSA	Total Acres Public Land Recommended for Wilderness Designation
Proposed Action		
	Needle's Eye	9,201
	Black Rock	6,590
	Fishhooks	10,883
	Day Mine	0
	Gila Box	0
	Turtle Mountain	0
	Javelina Peak	0
	Peloncillo Mountains	0
	Dos Cabezas Mountains**	11,998
	Total	38,672
All Wilderness		
	Needle's Eye	9,716
	Black Rock	8,492
	Fishhooks	15,215
	Day Mine	17,309
	Gila Box	17,831
	Turtle Mountain	17,422
	Javelina Peak	18,853
	Peloncillo Mountains	12,317
	Dos Cabezas Mountains**	18,509
	Total	135,664
Enhanced Wilderness		
	Needle's Eye	9,716
	Black Rock	7,614
	Fishhooks	15,215
	Day Mine	12,362
	Gila Box	15,272
	Turtle Mountain	9,104
	Javelina Peak	7,035
	Peloncillo Mountains	10,418
	Dos Cabezas Mountains**	14,555
	Total	101,291
Moderate Wilderness		
	Needle's Eye	9,201
	Black Rock	6,590
	Fishhooks	10,883
	Day Mine	0
	Gila Box	10,192
	Turtle Mountain	0
	Javelina Peak	0
	Peloncillo Mountains	0
	Dos Cabezas Mountains**	11,998
	Total	48,864

*The No Wilderness alternative recommends no parts of any of the WSAs for wilderness designation.

**Formerly Happy Camp Canyon WSA.

Source: Safford District Files

Under *No Wilderness (No Action)* the primary impact-producing factors would be the same as for the *Proposed Action* and *Moderate Wilderness* except that the WSA would remain open to mineral, energy and ORV use. In addition to 4 miles of fence, 2½ miles of road and a corral would also be built for livestock management.

BLACK ROCK

The primary impact-producing factors under the *Proposed Action* and *Moderate Wilderness* include designation of wilderness; high-level military training overflights; mineral and energy withdrawal; fluorspar mining outside the area designated wilderness; livestock grazing including maintenance of existing levels of use, construction of fence, waters and stock trail and maintenance of existing range facilities; ORV closure; increased non-motorized recreation use; hiking trail construction; continued people-related problems by recreationists crossing the Indian Reservation to access the wilderness; and construction of livestock exclosures.

The primary impacting-producing factors under *All Wilderness* would be the same as for the *Proposed Action* and *Moderate Wilderness* except the entire WSA would be designated wilderness and closed to mineral and energy use and ORV use and the fluorspar mining operation would occur in the area designated wilderness.

The primary impact-producing factors for *Enhanced Wilderness* would be the same as for the *Proposed Action* and *Moderate Wilderness*.

Under *No Wilderness (No Action)* the primary impact-producing factors would be the same as for the *Proposed Action* and *Moderate Wilderness* except that the WSA would remain open to mineral, energy and ORV use.

FISHHOOKS

The primary impact-producing factors under the *Proposed Action* and *Moderate Wilderness* include designation of wilderness; low-level military training overflights; mineral and energy withdrawal; livestock grazing including increased livestock use, construction of fence and waters and maintenance of existing range facilities; ORV closure; increased non-motorized recreation use; and maintenance of six livestock exclosures.

Under *All Wilderness* and *Enhanced Wilderness* the primary impact-producing factors would be the same as for the *Proposed Action* and *Moderate Wilderness*.

The primary impact-producing factors under *No Wilderness (No Action)* would be the same as for the *Proposed Action* and *Moderate Wilderness* except that the WSA would remain open to mineral, energy and ORV use.

DAY MINE

The primary impact-producing factors under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* include low-level military training overflights livestock grazing including maintenance of existing levels of use, construction of waters, fence and stock trail and maintenance of existing range facilities; recreation uses including ORV use; and maintenance of existing livestock exclosures.

Under *All Wilderness* the primary impact-producing factors are the same as for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that the area would be closed to mineral, energy and ORV use. Nonmotorized uses such as hiking and backpacking would increase under this alternative. Wilderness designation would also be an impact-producing factor.

The primary impact-producing factors under *Enhanced Wilderness* are essentially the same as for *All Wilderness*.

GILA BOX

The primary impact-producing factors under the *Proposed Action* and *No Wilderness (No Action)* include low- to high-level military training overflights; noises from the adjacent mine and smelter at Morenci; livestock grazing including maintenance of existing levels of use, construction of a storage tank and pipeline and maintenance of existing range facilities; increased recreation use; construction of wildlife habitat projects including livestock exclosures and riparian tree planting; and release of T&E fish and desert bighorn sheep.

The primary impact-producing factors under *All Wilderness* include designation of wilderness; low- to high-level military training overflights; noise from the adjacent mine and smelter at Morenci; minerals and energy withdrawal; livestock grazing including maintenance of existing levels of use, construction of a storage tank and pipeline and maintenance of existing range facilities; ORV closure; increased non-motorized recreation use; construction of wildlife habitat projects including livestock exclosures and riparian tree planting; and introduction of T & E fish and desert bighorn sheep.

Under *Enhanced Wilderness* and *Moderate Wilderness* the primary impact producing factors are essentially the same as for *All Wilderness* except ORV use would be permitted in areas not designated wilderness.

TURTLE MOUNTAIN

The primary impact-producing factors under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* include low- to high-level military training overflights; noise from the adjacent mine and smelter at Morenci; livestock grazing including maintenance of existing levels of use, construction of several waters, a line cabin, fences and stock trail, and maintenance of existing livestock facilities; recreation use including ORVs; maintenance of the Safford-Morenci Trail; a request for access to the state inholding for ranching purposes; construction of a livestock exclosure, water development and a study exclosure; and maintenance of existing livestock exclosures.

Under *All Wilderness* the primary impact-producing factors include designation of wilderness; low- to high-level military training overflights; noise from the adjacent mine and smelter at Morenci; minerals and energy withdrawal; livestock grazing, including reduced levels of use and maintenance of existing range facilities; ORV closure; maintenance of the Safford-Morenci Trail; increased non-motorized recreation use; a request for access to the state inholding; and maintenance of existing livestock exclosures.

The impact-producing factors under *Enhanced Wilderness* are essentially the same as for *All Wilderness* except that a livestock water would be constructed on that portion of the WSA not designated wilderness.

JAVELINA PEAK

The primary impact-producing factors under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* include low- to high-level military training overflights; livestock grazing including maintenance of existing use levels and range facilities; increased levels of recreation use including ORV use and hunting; and maintenance of existing wildlife waters.

Under *All Wilderness* the primary impact-producing factors are the same as under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that the area would be closed to mineral, energy and ORV use. In addition to existing factors, the impact of wilderness designation and increased non-motorized recreation use would be impact-producing factors.

The impact-producing factors under *Enhanced Wilderness* are the same as for *All Wilderness* except that most ORV use (on the dunes in the southern part of the WSA) would continue.

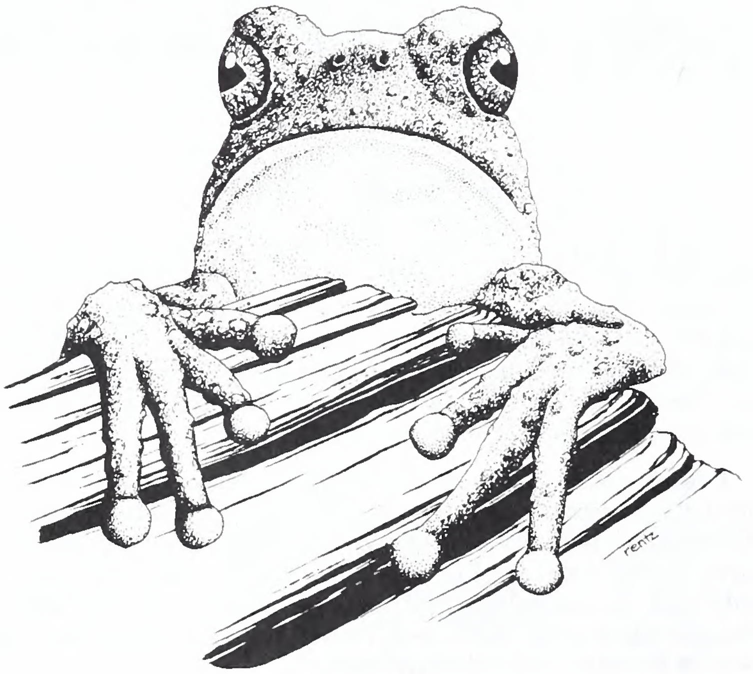
PELONCILLO MOUNTAINS

The primary impact-producing factors under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* include livestock grazing including maintenance of existing levels of use, construction of three waters and maintenance of range facilities; increased levels of hunting, ORV and rockhounding use; maintenance of two wildlife waters; and reintroduction of desert bighorn sheep.

Under *All Wilderness* and *Enhanced Wilderness* the impact-producing factors would be the same as for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that the area designated would be closed to mineral, energy and ORV use. In addition to existing factors, the impact of wilderness designation and increased non-motorized recreation use would also be impact-producing factors.

DOS CABEZAS MOUNTAINS
(Formerly Happy Camp Canyon)

The primary impact-producing factors under the *Proposed Action* and *Moderate Wilderness* include designation of wilderness; low-level military training overflights; mineral and energy withdrawal; mineral development and production in Buckeye Canyon outside the area designated wilderness; livestock grazing including maintenance of existing levels of use, construction of livestock fence and maintenance of existing range facilities; ORV closure; increased non-motorized recreation use; and maintenance of existing wildlife waters.



Under *All Wilderness* the primary impact-producing factors would be the same as for the *Proposed Action* and *Moderate Wilderness* except that the entire WSA would be closed to mineral, energy and ORV use and the mining operation in Buckeye Canyon would occur in the western part of the wilderness.

The impact-producing factors under *Enhanced Wilderness* would be the same as the *Proposed Action* and *Moderate Wilderness*.

Under *No Wilderness (No Action)* the primary impact-producing factors include low-level military training flights; mineral development and production in Buckeye Canyon; livestock grazing including maintenance of existing levels of use, construction of livestock fence and maintenance of existing range facilities; increased recreation use including ORV use; and maintenance of existing wildlife waters.

IMPACTS ON WATER

Water Quality

Wilderness management would generally preserve water quality. Significant resource development and surface disturbance that could adversely impact water quality would be prohibited or restricted. Because most water in the WSAs is seasonal or intermittent (see Water, Chapter 3), the impact discussions that follow refer quite often to intermittent streamflow or seasonal stock ponds, not always permanent sources of water.

NEEDLE'S EYE

The Proposed Action and *Moderate Wilderness* would cause no significant impact on water quality in the WSA. Off-road vehicles would continue to use the vehicle way on the eastern boundary of the area recommended for wilderness, resulting in erosion and increased sediment load in the Gila River and side canyons. The increase, however, would be insignificant because there is very little vehicle use of the route. When the powerline traversing the WSA is upgraded to 69 kv capacity there would be some surface disturbance at the site of each powerline tower. This disturbance and the resulting erosion and sedimentation would be minor, with insignificant impacts to water quality. The planned livestock exclosures and tree planting on the Gila River and maintenance of exclosures on Mescal Creek would result in increased streamside vegetation that would improve bank stability and reduce erosion, thereby decreasing sedimentation and improving water quality.

CONCLUSION. There would be no significant impact on water quality under these alternatives. Increased vegetation along Mescal Creek and the Gila River would improve bank stability, reduce erosion and sedimentation and improve water quality.

All Wilderness and *Enhanced Wilderness* would essentially cause the same effects as the *Proposed Action* and *Moderate Wilderness*. The difference would be that ORV use on the vehicle way in the eastern part of the WSA would not be permitted and, therefore, erosion and increased sediment load in the Gila River and side canyons would not occur.

CONCLUSION. There would be no significant impact on water quality under these alternatives.

No Wilderness (No Action)'s effects would be essentially the same as under the *Proposed Action* and *Moderate Wilderness*. The one difference would be that under this alternative, 2½ miles of road would be constructed to Dick Spring in the interior of the WSA. Construction would result in increased sedimentation in the side canyons and the Gila River but impacts would be temporary as the freshly disturbed soils would eventually stabilize reducing erosion and sedimentation. Use of the road by the rancher and recreationists would result in erosion and sedimentation but impacts would not be significant because vehicle travel would not be heavy.

CONCLUSION. There would be no significant impact on water quality under *No Wilderness (No Action)* but quality would be impacted temporarily due to road construction.

BLACK ROCK

Proposed Action and *Moderate Wilderness* would cause no significant impact on water quality. Development of the fluorspar mine outside the eastern boundary of the wilderness would result in 10 acres of surface disturbance. The plan of operations to conduct mining would prescribe measures to prevent erosion and, therefore, sedimentation in Black Rock Creek and side canyons would not significantly increase. Use and handling of chemicals and fuels in the mining operation would be prescribed in the plan of operations to prevent adverse impacts on water quality.

Livestock would graze in the wilderness and concentrations of cattle around stock ponds would leave the water unsuited for either human consumption or contact. The water is not intended, however, for human use and is confined to the pond. Construction of individual exclosures around ash and cottonwood trees in Black Rock Creek would result in increased streamside vegetation that would improve bank stability and reduce erosion. Water quality in Black Rock Creek would improve.

CONCLUSION. There would be no significant impact on water quality resulting from the mining development or livestock use of the stockponds. Increased vegetation along Black Rock Creek would improve bank stability, reduce erosion and sedimentation and improve water quality.

All Wilderness would have the same effect as the *Proposed Action* and *Moderate Wilderness*. The fluorspar mine development, and the resultant impacts on water quality, however, would be in the wilderness.

CONCLUSION. There would be no significant impact on water quality under *All Wilderness*.

Enhanced Wilderness would have the same impact on water quality as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. There would be no significant impact on water quality under *Enhanced Wilderness*.

No Wilderness (No Action) would cause essentially the same effects as the *Proposed Action* and *Moderate Wilderness*. The one difference would be that ORV use on Fourmile Canyon vehicle way would continue, resulting in increased erosion and sedimentation and decreased water quality. Because ORV use would be light, erosion, sedimentation and impacts to water quality would not be significant.

CONCLUSION. There would be no significant impact on water quality under *No Wilderness (No Action)*.

FISHHOOKS

Proposed Action and *Moderate Wilderness* would not significantly affect water quality. Livestock would graze in the wilderness and concentrations of cattle around stock ponds would leave the water quality unsuited for human consumption or contact. The water, however, is not intended for human use and is confined to the pond. Vehicles would continue to use the cherrystem road in the eastern part of the WSA not designated wilderness. Vehicle use would result in soil erosion and increased sedimentation in Day Mine Wash but overall impacts to water quality would not be significant because vehicle use would be light. Maintenance of livestock exclosures in the area designated wilderness would increase streamside vegetation and bank stability. The result would be reduced erosion and improved water quality.

CONCLUSION. There would be no significant impact on water quality under these alternatives. Maintenance of exclosures would increase streamside vegetation and bank stability, reduce erosion and improve water quality.

All Wilderness and *Enhanced Wilderness* would impact water quality the same as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. There would be no significant impact on water quality under these alternatives.

No Wilderness (No Action) would impact water quality the same as the *Proposed Action* and *Moderate Wilderness* except there would be more potential for erosion and sedimentation due to ORV use. Under this alternative, ORV use would continue on the vehicle ways in Lower Fishhook and Dutch Pasture Canyons, resulting in increased erosion and sedimentation. The overall impact on water quality, however, would still not be significant because use levels would remain low.

CONCLUSION. There would be no significant impact on water quality under *No Wilderness (No Action)*.

DAY MINE

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not significantly impact water quality. Livestock grazing would continue and cattle concentration around stock ponds would result in water quality unsuitable for human consumption or contact. The water, however, is not intended for human use and is confined to the ponds. Off-road vehicles would continue to use vehicle ways in the northern part of the WSA. This use would result in erosion and sedimentation of local drainages. Overall impacts to water quality would not be significant because use levels are low. Continued maintenance of livestock exclosures in the Left Fork of Markham Creek would increase streamside vegetation and bank stability and result in reduced sedimentation due to erosion and improved water quality.

CONCLUSION. There would be no significant impact on water quality under these alternatives. Increased vegetation along the Left Fork of Markham Creek would improve bank stability, decrease erosion and sedimentation and improve water quality.

All Wilderness would impact water quality the same as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that no ORV use would be permitted. As a result, no erosion would occur and water quality would not be degraded.

CONCLUSION. There would be no significant impact on water quality under this alternative.

Enhanced Wilderness would impact water quality the same as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use on the vehicle way beyond Brushy Tank would not be permitted. This would result in reduced erosion, sedimentation and impacts on water quality. Off-road vehicle use would continue on the fenceline way in the northwest part of the WSA with impacts to water quality the same as those described for *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. There would be no significant impact on water quality under *Enhanced Wilderness*.

GILA BOX

Proposed Action and *No Wilderness (No Action)* would not significantly impact water quality. Livestock grazing would continue on the table lands above the rivers and concentrations of livestock around stock ponds would leave water quality unsuitable for human consumption or contact. The water, however, is not intended for human use and is confined to the pond.

The Gila and San Francisco Rivers would be fenced to manage livestock and trees would be planted to restore stands of riparian vegetation. These management actions would increase streamside vegetation and bank stability and result in reduced erosion and improved water quality.

Off-road vehicle use in the canyon bottoms would increase sedimentation in the rivers as vehicles cross back

The head of George Canyon in Day Mine WSA lies in the steep and rugged slopes of the Gila Mountains.

and forth. At present levels of use (about 1,000 RVDs annually), impacts on water quality would not be significant. Engine breakdowns and vehicle accidents would result in fuel and motor oils entering the river system. At current levels of use, engine breakdown would not significantly degrade water quality.

CONCLUSION. There would be no significant impact on water quality under these alternatives. Livestock management fences along the rivers and tree planting would increase streamside vegetation, improving bank stability, decreasing erosion and sedimentation and improving water quality.

All Wilderness would impact water quality the same as the *Proposed Action* and *No Wilderness (No Action)* except that ORV use would not be permitted in the river canyons. This would result in improved water quality as no fuel or oil would enter the water and sedimentation would not be increased by ORVs driving through the river.

CONCLUSION. Under this alternative, there would be no significant impact on water quality. The ORV use of the river canyons would not be permitted, resulting in improved water quality.

Enhanced Wilderness would affect water quality the same as described for the *Proposed Action* and *No Wilderness (No Action)* except that ORV use would not be permitted in the river canyon downstream from the Gila and San Francisco Rivers' confluence. This would result in improved water quality as less fuel and oil would enter the river and sedimentation would decrease because 11 fewer river miles would be used by ORVs.

CONCLUSION. Under this alternative, there would be no significant impact on water quality. The ORV use would be prohibited on the Gila River downstream of its confluence with the San Francisco River, resulting in improved water quality.

Moderate Wilderness would impact water quality the same as described for the *Proposed Action* and *Moderate Wilderness* except that ORV use would not be permitted on the Gila River downstream from Eagle Creek. This would result in improved water quality as less fuel and oil would enter the river and less sedimentation would occur because eight fewer river miles would be used by ORVs.

CONCLUSION. Under this alternative, there would be no significant impact on water quality. The ORV use would be prohibited on the Gila River downstream of Eagle Creek, resulting in improved water quality.

TURTLE MOUNTAIN

Proposed Action, Moderate Wilderness, and *No Wilderness (No Action)* would not significantly impact water quality. Livestock grazing would continue and cattle concentrations around stock ponds would leave the water unsuitable for human consumption or contact. The water, however, is not intended for human use and is confined to stock ponds. A small amount of ORV use occurs on vehicle ways in the WSA. This activity would result in erosion and sedimentation in the area where the vehicle ways are located but use levels are not high and impacts to water quality would not be significant. A request for access to the state inholding in South Smith Canyon would impact water quality if the method of access granted was by road. Disturbed soils from road construction would result in increased soil erosion and decreased water quality in South Smith Canyon in the short term until the freshly disturbed soils stabilized. Maintenance of livestock exclosures in South Smith Canyon and construction of a new one in Hot Springs Canyon would increase streamside vegetation and improve bank stabilization. This would result in reduced erosion and improved water quality.

CONCLUSION. There would be no significant impact on water quality under these alternatives. A request for access to the state section in South Smith Canyon could result in temporary impacts to water quality if the approved method of access necessitated road construction. Increased vegetation in South Smith and Hot Springs Canyons would improve bank stability, reduce erosion and improve water quality.

All Wilderness would impact water quality essentially the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*. ORV use would be eliminated, a beneficial impact on water quality. Also under this alternative the livestock exclosure in Hot Springs Canyon would not be built reducing the beneficial effect this action would have on water quality.

CONCLUSION. There would be no significant impacts to water quality under *All Wilderness*.

Enhanced Wilderness would impact water quality the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would only be allowed to continue in the southern part of the WSA not recommended for wilderness. Because use in this part of the WSA is so light, adverse impacts to water quality would not be significant.

CONCLUSION. There would be no significant impacts to water quality under *Enhanced Wilderness*.

JAVELINA PEAK

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not significantly impact water quality. Livestock grazing would continue in the WSA and cattle concentrations around stock ponds would leave the water unsuitable for human consumption or contact. The water, however, is not intended for human use and is confined to the ponds. Off-road vehicle use on vehicle ways in the northern part of the WSA would result in erosion and sedimentation that would degrade water quality. Use in that area, however, is very light.

CONCLUSION. There would be no significant impacts to water quality under these alternatives.

All Wilderness would cause the same effect on water quality as that described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that no ORV use would be allowed. As a result, soils would not be disturbed nor water quality impacted.

CONCLUSION. There would be no significant impacts to water quality under *All Wilderness*.

Enhanced Wilderness would impact water quality the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. There would be no significant impact on water quality under *Enhanced Wilderness*.

PELONCILLO MOUNTAINS

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would allow livestock grazing in the WSA. Cattle concentration around stock ponds would leave the water unsuitable for human consumption or contact. The water, however, is not intended for human use and is confined to the ponds. A small amount of ORV use would result in soil erosion in Little Doubtful Canyon, increased sedimentation and decreased water quality. Because the use is so light, impacts to water quality would not be significant.

CONCLUSION. There would be no significant impacts to water quality under these alternatives.

All Wilderness would impact water quality the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would not be allowed. This would result in improved water quality.

CONCLUSION. There would be no significant impacts to water quality under *All Wilderness*.

Enhanced Wilderness would impact water quality the same as described for the *Proposed Action, Moderate Wilderness* and *No Action (No Wilderness)*.

CONCLUSION. There would be no significant impacts to water quality under *Enhanced Wilderness*.

DOS CABEZAS MOUNTAINS

Proposed Action and *Moderate Wilderness* would not significantly impact water quality. In Buckeye Canyon, just west of the area proposed for wilderness, development of the Buckeye and Apache mines would result in 115 acres of surface disturbance. About 100 acres of disturbance would occur in Buckeye Canyon. During periods of streamflow (after precipitation), increased levels of sediments would degrade the water quality in Buckeye Canyon. Because the mining plan of operations would prescribe measures to protect water quality, impacts would not be significant. Use and storage of fuels and chemicals for mining would be stipulated in the mining plan to prevent adverse impacts to water quality.

Howell Canyon is a major tributary to Happy Camp Canyon in Happy Camp Canyon WSA.

A small amount of ORV use takes place in Wood and Sheep Canyons outside the wilderness boundary. Continued ORV use would result in erosion and stream sedimentation that would degrade water quality. Due to the small amount of use, impacts would not be significant.

CONCLUSION. Mining operations in Buckeye Canyon west of the wilderness boundary would result in increased sediment load in Buckeye Canyon during periods of streamflow. Through mitigating measures in the mining plan of operations, impacts to water quality would not be significant. Impacts from ORV use would not be significant.

All Wilderness would impact water quality essentially the same as described for the *Proposed Action* and *Moderate Wilderness*. Under *All Wilderness*, however, the Buckeye Canyon mining operation and impacts to water quality would occur in the area designated wilderness. All ORV use would be prohibited, slightly improving water quality in Wood and Sheep Canyons.

CONCLUSION. There would be no significant impacts to water quality under *All Wilderness*.

Enhanced Wilderness would impact water quality the same as described for *All Wilderness*, except the mining in Buckeye Canyon would occur ouside the recommended area.

CONCLUSION. There would be no significant impact on water quality under *Enhanced Wilderness*.

No Wilderness (No Action) would impact water quality the same as described for the *Proposed Action* and *Moderate Wilderness*, except additional vehicle ways in Happy Camp and Howell Canyons would be open to ORV use. Increased sedimentation resulting from erosion would occur in these drainages but because use levels are so low, impacts to water quality would not be significant.

CONCLUSION. There would be no significant impacts to water quality under *No Wilderness (No Action)*.

Water Supply

There would be no adverse impact on water supply in any WSA, under any alternative except in Turtle Mountain WSA. In Black Rock, Fishhooks, Day Mine, Gila Box and Peloncillo Mountains WSAs additional livestock water facilities would be built under all alternatives, providing an additional supply of water for both livestock and wildlife.

TURTLE MOUNTAIN

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would allow the construction of eight miles of pipeline, three storage tanks, seven troughs and one spring development to supply an additional 90,000 gallons of water to livestock on two grazing allotments in the WSA. These alternatives would have no impact on the construction of this additional supply of water.

CONCLUSION. There would be no impact on the development of an additional 90,000 gallons of livestock water under these alternatives.

All Wilderness would not allow proposed livestock water facilities to be built because of adverse impacts on the natural qualities of the area recommended for wilderness and an additional 90,000 gallons of water would not be available to livestock and wildlife.

CONCLUSION. An additional 90,000 gallons of water would not be developed for livestock and wildlife use.

Under *Enhanced Wilderness* four miles of pipeline, one storage tank and three troughs would be constructed to supply 30,000 gallons of water to livestock on one grazing allotment outside the wilderness. On the other allotment, four miles of pipeline, two storage tanks and four troughs and a spring development would not be constructed because of adverse impacts to the natural values of the wilderness and an additional 60,000 gallons of water would be unavailable to livestock and wildlife.

CONCLUSION. Construction of four miles of pipeline, two storage tanks and four troughs and a spring development for livestock use would not be allowed and an additional 60,000 gallons of water would not be available for livestock and wildlife.

IMPACTS ON VEGETATION

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would preserve 9,201 acres of the creosotebush/bursage potential natural vegetation (PNV) type (see Table 3-2) through wilderness management. Adverse impacts to vegetation would not occur. Livestock would continue to graze in the area recommended for wilderness and through monitoring, proper forage use levels would be maintained—resulting in plant vigor and perpetuation of the vegetation. Off-road vehicle is only on existing roads and ways because the WSA is too rugged for crosscountry travel. As a result, ORV use would have no impact on vegetation.

In Mescal Creek and along the Gila River, livestock exclosure fences and tree planting would result in improved riparian vegetation.

CONCLUSION. There would be no adverse impacts to vegetation under these alternatives. Exclosure fences and tree planting would improve riparian vegetation along Mescal Creek and the Gila River.

All Wilderness and *Enhanced Wilderness* would have the same impact as the *Proposed Action* and *Moderate Wilderness*, except that all 9,716 acres of the creosotebush/-bursage PNV type (see Table 3-2) would be preserved through wilderness designation.

CONCLUSION. Impacts to vegetation would be essentially the same as described for the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action) would not cause significant impacts to vegetation. Impacts from livestock grazing, ORV use and wildlife habitat projects would be the same as described for the *Proposed Action* and *Moderate Wilderness*. Construction of 2½ miles of ranch road would remove about 6 acres of vegetation.

CONCLUSION. There would be no adverse impact on vegetation. The impacts would be the same as described for the *Proposed Action* and *Moderate Wilderness* except ranch road construction would remove about 6 acres of vegetation.

BLACK ROCK

Proposed Action and *Moderate Wilderness* alternatives would preserve 6,590 acres of the grama/tobosa shrubsteppe PNV type (see Table 3-2) through wilderness management. In the area recommended wilderness, no adverse impacts to vegetation would occur. Livestock grazing would continue and, through monitoring, proper forage use levels would be maintained—resulting in perpetuation of a healthy plant community. Some ORV use occurs but is confined to existing roads and vehicle ways, with no significant impact on vegetation. On Black Rock Creek, individual exclosure fences around ash and cottonwood trees would result in improved stands of riparian vegetation.

In the area not recommended for wilderness, vegetation on 10 acres of the WSA would be removed for road building and development of a small mine north of Jackson Mountain. When the mining is completed, vegetation would grow again on reclaimed ground.

CONCLUSION. There would be no adverse impacts to vegetation in the area recommended for wilderness. Exclosure fences would improve riparian vegetation along Black Rock Creek. In the area not recommended, 10 acres of vegetation would be removed by mining and road building.

All Wilderness would preserve the vegetation type of the entire WSA except for 10 acres used by a small mining operation north of Jackson Mountain. In the rest of the area recommended for wilderness, impacts to vegetation would be the same as described under the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *All Wilderness* would have the same impacts as those described under the *Proposed Action* and *Moderate Wilderness* except that the 10 acres of vegetation removed by the mining operation north of Jackson Mountain would take place in the area recommended for wilderness.

Enhanced Wilderness would preserve 7,614 acres of vegetation with the same impacts as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *Enhanced Wilderness* would preserve 7,614 acres of vegetation with the same impacts as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action) would not designate any of the WSA as wilderness but adverse impacts to vegetation would not be significant. Impacts to vegetation would be the same as those described for the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. There would be no significant adverse impacts to vegetation. The impacts would be the same as those described for the *Proposed Action* and *Moderate Wilderness*.

FISHHOOKS

Proposed Action and *Moderate Wilderness* would preserve 10,883 acres of a PNV type that is a transition between oak-juniper woodland and mountain mahogany-oak shrub vegetation (see Table 3-2). This vegetation type is not represented in the wilderness system and only Fishhooks, Day Mine and Turtle Mountain WSAs are potential representatives of this vegetation type. These alternatives would also preserve two plant communities in near climax condition. The watersheds of Upper and Middle Fishhook Canyons support a broadleaf riparian woodland and a stand of Lowell Ash. These are probably the best examples of these vegetation communities in the Gila Mountains.

Under these alternatives, livestock grazing would continue. Through monitoring, proper forage levels would be maintained, resulting in the perpetuation of a healthy plant community. The small amount of ORV use on existing roads and vehicle ways does not impact vegetation. Maintenance of exclosure fences in Lower Fishhooks Canyon would improve riparian vegetation along that drainage.

In the area not recommended for wilderness, livestock use levels would increase slightly but no significant impacts to vegetation would occur. No other land uses would adversely impact vegetation.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would preserve 10,883 acres of vegetation including the best examples of broadleaf riparian woodland and a stand of Lowell Ash in the Gila Mountains. Increased livestock use would have no adverse impacts on vegetation and exclosure fences in Lower Fishhook Canyon would improve stands of riparian vegetation.

All Wilderness and *Enhanced Wilderness* would preserve 15,215 acres of the Transition PNV type (see Table 3-2) with impacts the same as under the *Proposed Action* and *Moderate Wilderness* — except increased levels of livestock use would occur in the recommended area.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would preserve 15,215 acres of vegetation with impacts the same as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action) would not preserve vegetation through wilderness designation, but no significant adverse impacts would occur because no land uses would take place that would impact vegetation. Exclosure fences would improve riparian vegetation in Lower Fishhook Canyon.

CONCLUSION. Under *No Wilderness (No Action)*, there would be no adverse impact on vegetation. Exclosure fences in Lower Fishhook Canyon would improve the riparian vegetation along that drainage.

Stands of pinyon and juniper grow in several canyons in Fishhooks WSA.

DAY MINE

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would cause no adverse impacts to vegetation. Livestock would continue to graze in the WSA and with monitoring, proper forage utilization would occur—resulting in healthy vegetation communities. Some ORV use does take place but, due to the rugged nature of the WSA, is confined to existing roads and vehicle ways. As a result, there would be no adverse impact on vegetation. Maintenance of exclosure fences in the Left Fork of Markham Creek would result in improved riparian vegetation communities.

CONCLUSION. There would be no adverse impacts to vegetation under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*. Exclosure fences would improve riparian vegetation along the Left Fork of Markham Creek.

All Wilderness would preserve 17,309 acres of the Transition PNV type (see Table 3-2) through wilderness management. This vegetation type is not currently represented in the National Wilderness Preservation System and only Day Mine, Fishhooks and Turtle Mountain WSAs are potential representatives. Continued livestock grazing and wildlife management projects would impact vegetation the same as *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. *All Wilderness* would preserve 17,309 acres of the Transition PNV type with impacts the same as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*.

Enhanced Wilderness would have the same impacts on vegetation as *All Wilderness* but only 12,362 acres of the Transition PNV type would be preserved through wilderness management. The vegetation in the area not recommended for wilderness would not suffer because no land use actions would occur that would significantly impact vegetation.

CONCLUSION. There would be no adverse impact on vegetation under *Enhanced Wilderness*. Impacts to vegetation would be the same as *All Wilderness*.

GILA BOX

Proposed Action and *No Wilderness (No Action)* do not recommend wilderness designation but there would be no adverse impacts to vegetation. Livestock would continue to graze the side slopes and tablelands outside the river canyons. Monitoring and proper forage utilization levels would result in healthy vegetation communities. Off-road vehicle use would continue in the canyons but ORVs stay mostly on established trails through the mesquite bosques and on the open sandy/cobbly river bottom. Most evidence of ORVs is erased each year by increased flows at spring run-off. The impact the ORV use has on vegetation is minimal. In an effort to improve broadleaf riparian woodlands that once existed along the Gila and San Francisco Rivers, the river canyons would be fenced to manage livestock use, and cottonwood and willow trees would be planted. This project would greatly improve the riparian vegetation community along the Gila and San Francisco Rivers.

CONCLUSION. The *Proposed Action* and *No Wilderness (No Action)* would have no adverse impact on vegetation but would improve riparian vegetation along the Gila and San Francisco Rivers through exclosure fencing and tree planting.

All Wilderness would preserve 17,831 acres of creosotebush/bursage and grama/tobosa shrubsteppe PNV types through wilderness management. Adverse impacts to vegetation would not occur. The impacts to vegetation under *All Wilderness* would be the same as for the *Proposed Action* and *No Wilderness (No Action)* except ORV use would not be allowed in the river canyons. As a result the minimal impacts associated with ORV use would not take place.

CONCLUSION. *All Wilderness* would have no adverse impact on vegetation. Riparian vegetation along the rivers would improve with exclosure fencing, tree planting and exclusion of ORVs.

Enhanced Wilderness would preserve 15,272 acres of creosotebush/bursage and grama/tobosa shrubsteppe PNV types through wilderness management. Impacts to vegetation would be the same as under *All Wilderness* for the area recommended for wilderness (from the confluence of the Gila and San Francisco Rivers downstream to the WSA boundary). On the rivers upstream of their confluence (the area not recommended for wilderness), the impacts would be the same as described for the *Proposed Action* and *No Wilderness (No Action)*.

CONCLUSION. There would be no significant impact on vegetation under *Enhanced Wilderness*.

Moderate Wilderness would preserve 10,192 acres of creosotebush/bursage and grama/tobosa shrubsteppe PNV types along the Gila River downstream from Eagle Creek to the WSA boundary. The impact on vegetation would be the same as described for *Enhanced Wilderness*.

CONCLUSION. The impact of *Moderate Wilderness* on vegetation would be the same as described for *Enhanced Wilderness*—not significant.

TURTLE MOUNTAIN

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would recommend none of Turtle Mountain WSA for wilderness, but there would be no adverse impacts to vegetation. Livestock grazing would continue in the WSA and additional waters would be developed to improve livestock distribution and forage utilization. The result would be a healthier vegetation community. Some ORV use would occur but it would be confined to existing roads and vehicle ways. The impact on vegetation, therefore, would not be significant. Construction of an exclosure fence in Hot Springs Canyon and reconstruction of exclosure fences in South Smith Canyon would improve riparian vegetation in these parts of the WSA.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would have no adverse impact on vegetation, but construction and maintenance of exclosure fences would protect and preserve riparian vegetation in Hot Springs and South Smith Canyons.

All Wilderness would preserve 17,422 acres of the grama/tobosa shrubsteppe, creosotebush/bursage and the Transition PNV types through wilderness management (see Table 3-2). Under this alternative, no adverse impacts to vegetation would result from on-going land uses. Cattle would continue to graze in the area recommended wilderness but livestock use would be reduced by 299 AUMs (about 25 cattle) to maintain a healthy vegetation community. The ORV use described under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would not be allowed but, because ORV had little or no impacts on vegetation in the area recommended for wilderness, no significant improvement would result under *All Wilderness*. The exclosure fence in Hot Springs Canyon would not be permitted under this alternative due to adverse impacts to the natural values of Turtle Mountain WSA. The exclosure fences in South Smith Canyon would be rebuilt to improve riparian vegetation.

CONCLUSION. *All Wilderness* would not significantly impact vegetation. Riparian habitat would not benefit from an exclosure fence in Hot Springs Canyon because of adverse impacts to natural values of the area recommended for wilderness but reconstruction of the exclosure fences in South Smith Canyon would improve riparian vegetation.

Enhanced Wilderness would preserve 9,104 acres of the grama/tobosa shrubsteppe, creosotebush/bursage and Transition PNV types through wilderness management (see Table 3-2). The impacts to vegetation would be the same as under *All Wilderness* except the exclosure fence in lower Hot Springs Canyon would be built, improving riparian vegetation in that part of the WSA not recommended for wilderness under *Enhanced Wilderness*. Also, livestock use would be reduced by 250 AUMs (about 21 cattle) to maintain healthy vegetation communities.

CONCLUSION. Impacts to vegetation under *Enhanced Wilderness* would be the same as *All Wilderness* except the exclosure fence in lower Hot Springs Canyon would be built improving riparian vegetation.

Trujillo Canyon and its tributaries drain a large area in the center of Turtle Mountain WSA.

JAVELINA PEAK

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not designate any of the WSA as wilderness but significant impacts to vegetation would not result. Livestock would continue to graze in the WSA and monitoring would ensure proper forage utilization levels resulting in a healthy vegetation community. Under these alternatives ORV use would continue in the dunes of the southern part of the WSA, resulting in some damage to mesquites that grow in the dunes. The mesquites sprout back, however, and this vegetation community would not be significantly impacted.

CONCLUSION. While ORV use damages some mesquite growing in the dunes, impacts to vegetation would not be significant.

All Wilderness would preserve 18,853 acres of the grama/tobosa shrubsteppe PNV type through wilderness management. Under this alternative, the only land use affecting vegetation would be livestock grazing. Impacts to vegetation from livestock would be the same as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*. Off-road vehicle use would not be permitted under *All Wilderness*, eliminating this impact on vegetation.

CONCLUSION. There would be no adverse impacts to vegetation under *All Wilderness*.

Enhanced Wilderness would preserve 7,035 acres of the grama/tobosa shrubsteppe PNV type with impacts the same as under *All Wilderness*. In the area not recommended for wilderness, ORV use of the dunes would continue with damage to some mesquite growing in the dunes. The mesquites would sprout back with no significant impact on the vegetation community.

CONCLUSION. *Enhanced Wilderness* would have no significant impact on vegetation. Off-road vehicle use of the dunes would continue in the area not recommended for wilderness with no significant adverse impacts to vegetation.

PELONCILLO MOUNTAINS

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would have no adverse impacts on vegetation. Livestock would continue to graze in the WSA and monitoring would ensure proper forage utilization levels to maintain a healthy plant community. Some ORV use would occur on the road and vehicle ways in Little Doubtful Canyon but since travel would be confined to these routes, no impacts to vegetation would result. Off-road vehicle use on the flatlands of the eastern part of the WSA in New Mexico would occur but use is so low, significant impacts would not result.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would have no adverse impact on vegetation.

All Wilderness would preserve 12,317 acres of the oak-juniper woodland vegetation type through wilderness management. The only on-going land use affecting vegetation would be livestock grazing and the impacts would be insignificant, as discussed for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. *All Wilderness* would preserve 12,317 acres of oak-juniper woodland vegetation with no adverse impacts resulting from continued livestock grazing.

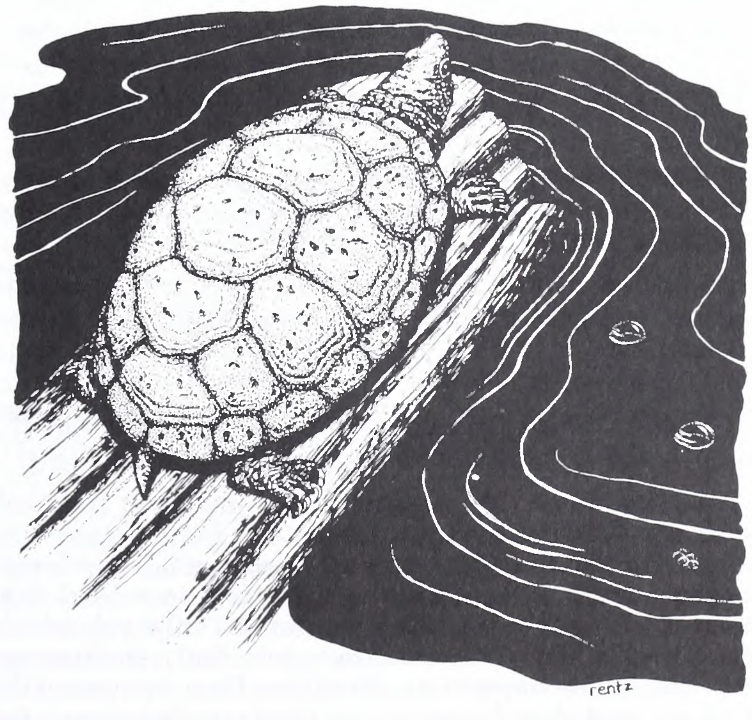
Enhanced Wilderness would preserve 10,418 acres of the oak-juniper woodland vegetation type with impacts the same as described under *All Wilderness*. In the areas not recommended for wilderness, ORV use would continue but because use levels are low and travel would be mostly on existing roads and vehicle ways, no adverse impacts would occur.

CONCLUSION. *Enhanced Wilderness* would preserve 10,418 acres of oak-juniper woodland vegetation type with no adverse impacts from continued livestock grazing. In the area not recommended for wilderness, continued ORV use would not significantly impact vegetation.

DOS CABEZAS MOUNTAINS

Proposed Action and *Moderate Wilderness* would preserve 11,998 acres of oak-juniper woodland and grama/tobosa shrubsteppe vegetation types (see Table 3-2) through wilderness management. Under these alternatives, cattle would continue to graze in the area recommended for wilderness. Monitoring would ensure that proper utilization levels would be maintained, resulting in healthy plant communities.

In the area not recommended for wilderness, ORV use would continue. Because vehicle travel would take place on



roads and vehicle ways, no adverse impacts to vegetation would occur. In the western part of the WSA in Buckeye Canyon, the old Buckeye and Apache mines would be developed. Under these alternatives 115 acres of vegetation would be removed by road building, mining and waste dumps in Buckeye Canyon.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would preserve 11,998 acres of oak-juniper woodland and grama/tobosa shrubsteppe vegetation types with no adverse impacts to vegetation. In the area not recommended for wilderness, 115 acres of vegetation in Buckeye Canyon would be removed by mining operations.

All Wilderness would preserve 18,509 acres of the oak-juniper woodland and grama/tobosa shrubsteppe vegetation types. Impacts to vegetation would be the same as described for the *Proposed Action* and *Moderate Wilderness* except vegetation disturbance attributable to mining in Buckeye Canyon would now occur in the western part of the area recommended for wilderness.

The bouldery terrain of the Dos Cabezas Mountains in Happy Camp Canyon WSA provides scenic interest as well as challenges to hikers and rock scamblers.

CONCLUSION. There would be no adverse impacts to vegetation except in Buckeye Canyon where 115 acres would be removed by mining operations.

Enhanced Wilderness would have the same impacts to vegetation as the *Proposed Action* and *Modcrate Wilderness.*

CONCLUSION. Impacts to vegetation would be the same as the *Proposed Action* and *Moderate Wilderness.*

No Wilderness (No Action) would continue livestock grazing, ORV use and mining in the WSA. Impacts to vegetation from cattle grazing would not be adverse because forage utilization would be kept to a level that ensures a healthy vegetation condition. Off-road vehicle use would continue on existing roads and vehicle ways with no adverse impacts to vegetation. Development of the Buckeye and Apache mines in Buckeye Canyon of the western part of the WSA would result in 115 acres of vegetation disturbance.

CONCLUSION. *No Wilderness (No Action)* would have no adverse impact on vegetation except in Buckeye Canyon where 115 acres of vegetation would be removed by mining.

IMPACTS ON THREATENED AND ENDANGERED PLANTS

No threatened or endangered (T&E) plants have been found in any of the WSAs. One listed T&E species may grow in Needle's Eye WSA and another species under review for listing as T&E in Needle's Eye and Javelina Peak WSAs (see Table 3-3). The analysis that follows, therefore, will address only those species and those WSAs.

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would preserve the two candidate T&E species thought to be in the area recommended for wilderness. No major surface disturbing activities would occur that would remove species or significantly alter habitats. Wilderness management would emphasize the continuance of natural ecological process with little or no human intervention that would adversely impact the plant species. Increased visitor use would not harm the plants because they grow on rock ledges where most visitors would not go. Continued cattle grazing would not impact the species because they are not plants cows prefer to eat.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would preserve the two candidate T&E species thought to grow in the area recommended for wilderness. Anticipated land uses would not adversely impact the plant species.

All Wilderness and *Enhanced Wilderness* would have the same impact on the T&E species as the *Proposed Action* and *Moderate Wilderness.*

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would preserve the two T&E species with no adverse impacts from anticipated land uses.

No Wilderness (No Action) would not significantly impact the T&E plant species. These species are found in enough places that their continued existence would not be jeopardized by the minimal disturbance possible from planned livestock, recreation, utility and wildlife activities. In addition, BLM policy and the Endangered Species Act mandate the protection of threatened, endangered and sensitive plant species. Expected adverse impacts to T&E plant species must be mitigated.

CONCLUSION. No significant adverse impacts would result from nondesignation.

JAVELINA PEAK

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not significantly impact the T&E plant thought to grow in the WSA. Nondesignation would not impact the plant because it grows on rock ledges where it would not be disturbed by anticipated land uses. Livestock would continue to graze in the WSA but the T&E species would not be impacted because it is not preferred by cattle. Off-road vehicles would continue to use the dunes in the southern part of the WSA but this is not where the plant is normally found. In addition, this plant is found in enough places that its continued existence would not be jeopardized by the expected livestock and ORV use.

CONCLUSION. No significant impacts would result from nondesignation.

All Wilderness would preserve the T&E plant species thought to occur in the area recommended wilderness. The anticipated livestock and primitive recreation use would not remove the species or significantly alter its habitat. Recreation uses such as hiking or camping would not harm the species because it grows on ridges where most visitors would not go. Wilderness management would emphasize continued natural ecological processes with little or no human intervention that would adversely impact this plant species.

CONCLUSION. *All Wilderness* would preserve the T&E plant species thought to be in the area recommended for wilderness. Anticipated livestock and recreation uses would not adversely affect the plant.

Enhanced Wilderness would have the same impact on the T&E plant as *All Wilderness*. There would be no adverse impact on the plant in that part of the WSA not recommended for wilderness as the ORV use would not occur where the plant grows and cattle do not prefer to eat it.

CONCLUSION. *Enhanced Wilderness* would have the same impact on the T&E plant species as *All Wilderness*. In the area not recommended for wilderness, there would be no significant adverse impact.

IMPACTS ON AIR QUALITY

Under the Clean Air Act as amended in 1977, BLM-administered lands were given a Class II air quality designation. This standard allows for moderate deterioration of air quality associated with moderate, well-controlled industrial and population growth. The Wilderness Management Policy (see Appendix 2) requires BLM to manage wilderness areas as Class II air quality areas. Designation of air quality standards is the responsibility of the state, not BLM. While special interest groups could bring pressure on the state to change air quality standards, BLM would manage wilderness as they are currently designated unless reclassified by the state.

Based on an analysis of the anticipated management actions in each WSA, there would be no significant impact on air quality. The expected mining operations in Black Rock and Dos Cabezas Mountains WSAs would produce temporary degradation of air quality from airborne dust, but air quality standards would not be violated. Because the ore would not be processed on site at either mining operation and because the only anticipated air quality degradation would result from airborne dust, no significant impact on air quality would occur in any WSA.

CONCLUSION. Anticipated management actions in each WSA would not significantly impact air quality.

IMPACTS ON WILDERNESS VALUES

Wilderness areas would be devoted to the public purposes of recreational, scenic, scientific, educational, conservational and historical uses. Land uses incompatible with wilderness preservation would be prohibited, thus ensuring the protection of existing natural qualities and roadless character, and providing continued opportunities for solitude and primitive and unconfined recreation. Wilderness designation would preserve the special features of the WSAs by limiting surface-disturbing activity and would ensure multiple resource benefits. Preservation of natural ecosystems, extension of visual resource management (VRM) Class I objectives and reduction of disturbance to wildlife and cultural resources would all result from wilderness designation. The relative permanency of a Congressional wilderness designation would further ensure these benefits.

Adding any or all of the Safford District WSAs to the *National Wilderness Preservation System* (NWPS) would not contribute significantly to better geographic distribution of wilderness in Arizona, New Mexico, or the region. Existing wilderness areas are fairly evenly distributed throughout the geographic areas. The addition of administratively endorsed wilderness areas and any of the areas under study would further contribute to the distribution. The addition of any of the WSAs to the NWPS would not greatly enhance opportunities for solitude or primitive recreation within a day's driving time of Tucson and Phoenix, Arizona and El Paso, Texas since many wilderness areas already exist near each of these cities (see Solitude or Primitive Recreation Opportunities, Chapter 3).

Many of the wilderness values found in Needle's Eye, Black Rock, Fishhooks, Day Mine, Gila Box, Turtle Mountain and Dos Cabezas Mountains WSA are associated with the presence of water—riparian habitat, wildlife and scenery. If the water sources of these WSAs (see Water, Chapter 3) were lost through appropriation of water rights to individuals, the associated wilderness values would be impacted. The wilderness values under all alternatives, however, would not be lost because BLM has filed for water rights on many of the sources in each WSA. The purpose of the filings is to reserve water for livestock, wildlife and recreation needs (see Appendix No. 1). While BLM has not filed for water rights on the Gila and San Francisco Rivers, these water sources would not be lost. The decreed rights of water users downstream of the Gila Box WSA would guarantee a flow through the WSA. To further protect the flow through the WSA, BLM could also apply for a nonconsumptive water right.

The *Wilderness Study Policy* (BLM 1982c) requires an assessment of the manageability of each WSA as wilderness in determining its suitability for wilderness designation. Based on the wilderness values of each WSA described in Chapter 3 and the impacts of anticipated management actions analyzed in Chapter 4, the manageability of each WSA, under each alternative, has been determined and presented in Appendix No. 3.

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would designate as wilderness 9,201 acres of the WSA. The northwestern boundary would be adjusted to more easily recognizable topographic features, resulting in a more definable boundary. The eastern boundary of the wilderness would follow the vehicle way, improving the natural qualities of the area, since this evidence of man would be removed from the area recommended for wilderness.

These alternatives would preserve the natural qualities of an essentially unaltered landscape. Wilderness management would provide outstanding opportunities for visitors to experience solitude and primitive and unconfined types of recreation. Numerous canyons and rugged mountainous topography provide an excellent setting for visitors to be alone. Opportunities for hiking, backpacking, rock climbing and other primitive recreational activities would be ensured by wilderness management. The special features of the WSA, riparian habitat, areas of scenic beauty and a bald eagle wintering area, would be preserved and add to the overall wilderness quality of the WSA.

In Needle's Eye WSA the Gila River has cut a dramatic canyon through southeast Arizona's Mescal Mountains.

Other existing uses would continue in the wilderness without significant impacts to the wilderness values. Low-level, military training flights would temporarily disrupt the opportunities for solitude throughout the wilderness. Impacts are short-term, however, lasting about one minute. Construction and maintenance of livestock and wildlife facilities would create small, isolated and localized impacts on the wilderness qualities of the WSA. The powerline would continue to be maintained by horseback and/or helicopter. Helicopter use would temporarily impact the solitude the area provides, lasting for the duration of the flight. The powerline is surveyed every 90 days to determine maintenance needs with each flight lasting about 30 minutes. Upgrading the powerline to 69 kv capacity would not impact the natural values because existing towers would be used and methods of maintenance would not change. Opportunities for solitude would be temporarily impacted during upgrading operations.

Wilderness designation would expand vegetation diversity in the NWPS. The WSA represents the creosotebush/bursage vegetation type, not now represented in the NWPS.

CONCLUSION. These alternatives would preserve higher quality wilderness values on 9,201 acres of the WSA. Existing military, wildlife, range and utility uses of the wilderness would continue with temporary or minimal impacts to wilderness values.

All Wilderness and *Enhanced Wilderness* would designate as wilderness all 9,716 acres of the WSA and would have the same impacts as the *Proposed Action* and *Moderate Wilderness* with the following exception: ORV, hunting and ranching use of the vehicle way in the eastern part of the wilderness would be prohibited, improving opportunities for solitude in that part of the WSA recommended for wilderness.

CONCLUSION. These alternatives would preserve the wilderness values of the entire Needle's Eye WSA. Existing military, wildlife, range and utility uses would continue with temporary or minimal impacts to wilderness values. Vehicle use of the way in the eastern part of the area recommended for wilderness would be prohibited, improving opportunities for solitude in that area.

No Wilderness (No Action) does not recommend Needle's Eye WSA as wilderness and the wilderness values in the eastern part of the WSA would be impaired. Construction of a ranch road from the vehicle way in the eastern part of the WSA to Dick Spring would impair naturalness in the eastern part of the WSA. Opportunities for solitude would also be impaired by vehicle travel on the road, and recreation activities in the WSA would shift from the present primitive forms to motorized types of recreation. The road and the impacts to wilderness values would be permanent.

CONCLUSION. Nondesignation would result in the permanent loss of natural values in the eastern part of the WSA and a shift from primitive to motorized forms of recreational opportunities. Opportunities for solitude would also decrease due to vehicle use of this road.

BLACK ROCK

Proposed Action and *Moderate Wilderness* would designate 6,590 acres as wilderness. Boundary adjustments on the east and southeast sides of the WSA would provide a more easily recognizable boundary that would enhance management and preservation of the area's wilderness values.

Wilderness designation would preserve the natural values and special features such as Black Rock (an interesting geologic feature in the northwestern part of the WSA), riparian vegetation and raptor nesting sites. These special features supplement the overall wilderness character of the area recommended for wilderness. Wilderness management of this area would also provide outstanding opportunities to experience solitude and participate in primitive recreational activities. Because the WSA is contiguous to the Forest Service Santa Teresa Wilderness, these two areas would provide 33,370 acres of outstanding wilderness lands.

Under these alternatives, other uses would continue with small, isolated and localized impacts to the wilderness values of the area. Construction and maintenance of livestock and wildlife facilities would have aminimal impact on the wilderness qualities of the area. Exploration and development of the fluorspar mine outside the eastern boundary of the area recommended for wilderness would have adverse impacts on the natural values (about 10 acres of disturbance) and opportunities for solitude in that part of the WSA not designated wilderness under these alternatives. The presence of the mine adjacent to the wilderness would have some impact on the opportunities for solitude in the area recommended for wilderness but the impacts would be insignificant because the operation would be small. As visitors progressed away from the boundary deeper into the central part of the wilderness (including the contiguous Forest Service Wilderness), this impact would be eliminated.

Under these alternatives, ORV, hunting and ranching use of the Fourmile Canyon vehicle way would be prohibited. Elimination of vehicles in this part of the wilderness would improve opportunities for solitude.

Wilderness designation would expand the diversity of the NWPS by the inclusion of the grama/tobosa shrub-steppe vegetation type, a vegetation type not now represented in the NWPS.

CONCLUSION. These alternatives would preserve higher quality wilderness values on 6,590 acres of the WSA. Existing wildlife and range uses would continue without significant impact on wilderness values. Designation would expand the existing Santa Teresa Wilderness from 26,780 acres to 33,370 acres, providing outstanding wilderness opportunities.

All Wilderness would designate all 8,492 acres of Black Rock WSA as wilderness. Impacts to wilderness values would be the same as the *Proposed Action* and *Moderate Wilderness* except that the fluorspar mining development (a valid existing right) would be in the eastern part of the area recommended for wilderness, north and east of Jackson Mountain. The result would be 10 acres of permanent disturbance of natural values of the wilderness and long-term disruption (during mining operations) of opportunities for solitude.

CONCLUSION. *All Wilderness* would preserve the wilderness values of nearly all the Black Rock WSA. Fluorspar mining would permanently disturb the natural values of 10 acres of the eastern part of the wilderness and opportunities for solitude would be impacted during operations. Existing livestock and wildlife uses would continue without significant impact on wilderness values.

Enhanced Wilderness would designate 7,614 acres as wilderness with the same impacts to wilderness values as the *Proposed Action* and *Moderate Wilderness.*

CONCLUSION. Impacts to wilderness values would be the same as the *Proposed Action* and *Moderate Wilderness.*

No Wilderness (No Action) would not designate any of Black Rock WSA as wilderness and wilderness values would be lost in the eastern part of the WSA. Development of the fluorspar mine would permanently impact 10 acres of this part of the WSA. Opportunities for solitude would also be adversely impacted by the mining activity in the immediate area around the mine. Off-road vehicle use of the Fourmile Canyon way would continue, causing temporary impairment of opportunities for solitude.

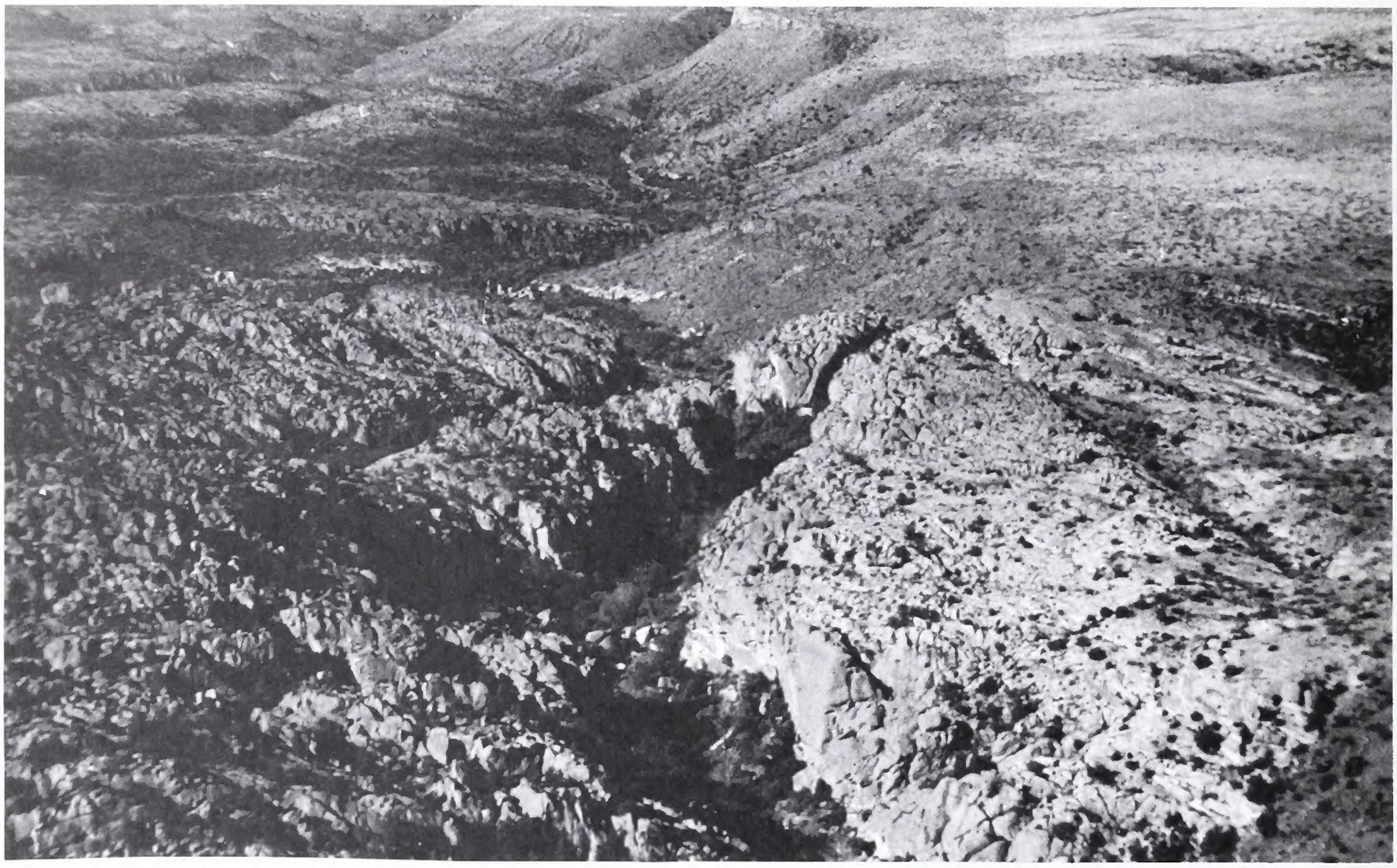
In the rest of the WSA, continued livestock and wildlife management activities would have no significant impact on wilderness values.

CONCLUSION. Nondesignation would result in the permanent loss of 10 acres of natural values in the eastern part of the WSA north of Jackson Mountain at the fluorspar mine. Opportunities for solitude would also be impacted during mining operations. In the rest of the WSA, wilderness values would not be significantly impacted.

FISHHOOKS

Proposed Action and *Moderate Wilderness* would designate as wilderness 10,883 acres of Fishhooks WSA, preserve the area's natural qualities and maintain outstanding opportunities for visitors to experience solitude. The southeastern boundary of the wilderness would follow the ridgeline south of Dutch Pasture Canyon, excluding lands of lower wilderness quality (because of a cherrystem road, a livestock water and nearness to a frequently traveled boundary road). The rugged topography and canyons offer numerous secluded spots, particularly Fishhook, Sam, Steer Springs and Dutch Pasture Canyons. These alternatives would also continue to provide outstanding primitive recreational opportunities such as hiking, hunting and sightseeing. Wilderness designation would preserve many special features, including riparian habitat, raptor nesting sites, archaeological sites and two relatively undisturbed climax plant communities.

Under these alternatives, no existing resource uses would significantly impact the area's wilderness values.



Upper Fishhook Canyon in Fishhooks WSA crosses the center of the above photo. This highly natural area includes the most rugged portion of the Gila Mountain and offers outstanding opportunities for solitude and many forms of primitive recreation.

Livestock and wildlife facilities would be constructed and maintained with small, isolated and localized effects on natural values and temporary effects on opportunities for solitude and primitive recreation. Low-level, military training flights would temporarily disrupt opportunities for solitude throughout the area recommended for wilderness but impacts would be short-term, lasting about one minute. Off-road vehicle use on ways in Lower Fishhook and Dutch Pasture Canyons would be prohibited, improving opportunities for solitude in these canyons.

Wilderness designation would provide an excellent opportunity to expand vegetation diversity in the NWPS. Fishhooks WSA is in the Transition Potential Natural Vegetation Type (see Table 3-2), not now represented in the wilderness system.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would preserve higher quality wilderness values in 10,883 acres of the WSA. Existing military, livestock and wildlife values would continue without significant adverse impact on the wilderness values. Off-road vehicle use would be prohibited in Lower Fishhook and Dutch Pasture Canyons, improving opportunities for solitude.

All Wilderness and *Enhanced Wilderness* would designate as wilderness all 15,215 acres of Fishhooks WSA with impacts essentially the same as under the *Proposed Action* and *Moderate Wilderness.*

CONCLUSION. Impacts to wilderness values would be the same essentially as the *Proposed Action* and *Moderate Wilderness.*

No Wilderness (No Action) does not recommend Fishhooks WSA as wilderness. Military overflights would cause short-term, temporary impacts to opportunities for solitude. Maintenance and construction of livestock and wildlife waters and fences would cause small, isolated, permanent impacts to natural qualities throughout the WSA. During maintenance or construction, opportunities for solitude and primitive recreation would be temporarily disrupted. Off-road vehicle use would continue in Dutch Pasture and Lower Fishhook Canyons, temporarily impacting solitude. Because of the small size, scattered locations, and temporary nature of the expected land uses, overall impacts to the wilderness values of the WSA would be minimal.

CONCLUSION. *No Wilderness (No Action)* would designate none of Fishhooks WSA as wilderness and some minimal impairment of wilderness values would result.

DAY MINE

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not include Day Mine WSA in the

NWPS. Low-level military overflights would cause short-term, temporary impacts to opportunities for solitude. Maintenance and construction of livestock waters and facilities would cause small, scattered, permanent impacts to the natural qualities of the WSA. During the maintenance or construction, opportunities for solitude and primitive recreation would be temporarily disrupted. Maintenance of livestock exclosures in the Left Fork of Markham Creek would protect and enhance riparian vegetation, valuable wildlife habitat and wilderness values. Off-road vehicle use would continue on the cherrystem roads and vehicle ways in the WSA, temporarily impacting opportunities for both solitude and primitive recreation. Permanent impacts to the natural qualities of the WSA would not occur from ORV use. Because of the small size, scattered locations and temporary nature of the anticipated land uses, permanent impacts to the wilderness values of the WSA would be minimal.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would not designate any of Day Mine WSA as wilderness and some minimal impairment of wilderness values would result.

All Wilderness would designate all 17,309 acres of Day Mine WSA as wilderness, preserving the area's natural qualities. Designation would preserve and provide outstanding opportunities for solitude and primitive recreational activities. The area's size, shape and diversity of topography and vegetation contribute to opportunities for solitude. The pinyon-juniper forest of the higher elevations offers numerous secluded spots. The physical and biological features of the WSA also provide outstanding opportunities for hiking, camping, hunting, horseback riding, photography and sightseeing in an isolated, natural setting. The area's special features—scenic topography, riparian habitat and nesting sites for raptors—would also be protected.

Continuation of livestock grazing and wildlife management in the area designated wilderness would not affect the quality of the wilderness resource.

Vehicles traveling off road from the cherrystem and boundary roads would be prohibited, improving opportunities for solitude. Low-level, military training flights would temporarily disrupt opportunities for solitude throughout the area recommended for wilderness but impacts would be short-term, lasting about one minute.

The WSA is in the Transition Potential Natural Vegetation Type (see Table 3-2), not represented in the NWPS. Wilderness designation would provide an excellent opportunity to expand the diversity of the NWPS.

CONCLUSION. *All Wilderness* would preserve the wilderness values of all 17,309 acres of Day Mine WSA. Continuation of exiisting military, livestock and wildlife uses would have no significant adverse impact on the wilderness values. Off-road vehicle use would be prohibited, improving opportunities for solitude in the northern part of the WSA.

Enhanced Wilderness would designate 12,362 acres in wilderness. The northwestern and northern parts of the WSA that include several cherrystem roads, vehicle ways and range facilities, would not be included in the area recommended for wilderness. Therefore, the natural values and opportunities for solitude would improve.

Other impacts to wilderness values would be the same as under *All Wilderness*. Continuation of existing military, livestock and wildlife uses would have no significant adverse impact on the wilderness values. Wilderness values of the lands not designated would remain essentially natural with some small, isolated impacts on the area's natural qualities from construction of livestock facilities and occasional, temporary impacts to opportunities for solitude caused by vehicle use of roads and vehicle ways.

CONCLUSION. *Enhanced Wilderness* would designate 12,362 acres of higher quality wilderness lands, preserving their wilderness values. Continuation of existing uses would have minimal impact on the wilderness values. Off-road vehicle use would be prohibited, improving opportunities for solitude.

GILA BOX

Proposed Action and *No Wilderness (No Action)* would not designate any of Gila Box WSA as wilderness. Nondesignation would allow ORV use to continue and engine noise would temporarily impact opportunities for solitude and primitive recreation in the river canyons where use occurs and in the eastern part of the WSA where ORVs use the Gillard Hot Springs road. Military training flights and noise from the adjacent mine and smelter at Morenci, Arizona would also temporarily disrupt solitude in the WSA. These noises would be temporary with no lasting physical impacts to the natural qualities of the WSA.

Construction and maintenance of livestock management and wildlife habitat projects would have no adverse impact on wilderness values of the WSA under these alternatives. In fact, fences built to manage livestock use in the river canyons, riparian tree planting and introduction of the woundfin and desert bighorn sheep are all measures that would improve the wilderness values of the WSA with minimal impact on the natural values of the WSA.

CONCLUSION. Nondesignation would result in minimal impact on the natural qualities of the WSA. Noise from ORV use, military overflights and the mine and smelter adjacent to the WSA would temporarily impact opportunities for solitude and primitive recreation. Livestock management fences along the rivers, riparian tree planting and introduction of T&E species would improve the wilderness values of the WSA.

All Wilderness would designate all 17,831 acres of Gila Box WSA as wilderness. This alternative would preserve this highly scenic and natural area and its special features, including two free-flowing perennial rivers, riparian habitat, a bald eagle wintering area, interesting geological features and historic and prehistoric sites. Outstanding opportunities for solitude would be preserved in the rugged canyons of the Gila and San Francisco Rivers. Opportunities for hiking, backpacking, seasonal floatboating, camping, photography and sightseeing are outstanding and would also be preserved.

Wilderness values would not be adversely impacted by construction and maintenance of livestock and wildlife facilities. In fact, livestock management fences along the rivers, tree planting and introduction of the woundfin and desert bighorn sheep would enhance the values of the area recommended for wilderness. Existing off-road vehicle (ORV) use would be prohibited with wilderness designation. Enforcing this ORV closure would require BLM to regularly patrol the rivers during periods of low water to prevent temporary impacts to solitude that wilderness visitors expect to experience. Moreover, ORV use of the Gillard Hot Springs cherrystem road would impact solitude of the extreme eastern portion of the Gila River canyon. Military training overflights and noises from the adjacent mine and smelter at Morenci, Arizona would have an impact on opportunities for solitude but impacts would not be significant because they would be temporary.

Including the WSA in the NWPS would expand the diversity of the wilderness system by adding two vegetation types not now represented, the creosotebush/bursage and grama/tobosa shrubsteppe vegetation types.

CONCLUSION. *All Wilderness* would preserve the wilderness character of all 17,831 acres of the Gila Box WSA including many special features such as cultural resources and the Gila and San Francisco Rivers. Temporary and nonsignificant impacts to solitude, however, would result from military overflights and noise from the mine and smelter at Morenci, Arizona. BLM would regularly patrol the river canyons to prevent unauthorized ORV use.

Enhanced Wilderness would preserve the wilderness values of 15,272 acres of the Gila Box WSA. It would have impacts similar to those under *All Wilderness* but would designate 2,559 fewer acres east of the confluence of the Gila and San Francisco Rivers and protect seven fewer river miles. *Enhanced Wilderness* would preserve higher quality wilderness lands excluding lands in the eastern part of the WSA with more evidence of man.

Anticipated military, livestock and wildlife management uses would not have significant impacts on the wilderness values of the area recommended for wilderness. The planned wildlife habitat projects would enhance the wilderness values of the WSA. Off-road vehicle use would continue on the Gila and San Francisco Rivers upstream from their confluence, resulting in temporary impacts to opportunities for solitude and primitive recreation in the area not recommended for wilderness.

CONCLUSION. *Enhanced Wilderness* would preserve 15,272 acres of higher quality wilderness lands. Existing military, livestock and wildlife activities would continue without significant impacts to the wilderness values. Opportunities for solitude and primitive recreation would be temporarily impacted by ORV use in the eastern part of the WSA not recommended for wilderness.

Moderate Wilderness would preserve 10,192 acres of wilderness lands, centering on the Gila River and the part of the canyon known as the Gila Box. It would have impacts similar to *Enhanced Wilderness* but would designate 5,080 fewer acres. This alternative would preserve eight miles of the Gila River, but none of the San Francisco River. Anticipated military, livestock and wildlife habitat activities would continue in the area recommended for wilderness with minimal impact on wilderness values. Off-road vehicle use would continue on the Gila and San Francisco Rivers upstream from Eagle Creek. In that part of the WSA, not recommended for wilderness, opportunities for solitude and primitive recreation would be temporarily impacted.

CONCLUSION. *Moderate Wilderness* would designate as wilderness an area surrounding the Gila Box and preserve the wilderness values of 10,192 acres. Impacts to solitude and primitive recreation caused by ORV use would continue on the Gila and San Francisco Rivers upstream from Eagle Creek. Other multiple uses of the area recommended for wilderness would continue without significant impact on the wilderness values.

TURTLE MOUNTAIN

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not designate Turtle Mountain WSA as wilderness. As a result, the wilderness values of the WSA would be significantly impaired. If the request for access to the state inholding resulted in approval for road construction to implement a livestock grazing system, it would permanently impair the roadless character and natural qualities of South Smith Canyon. Solitude would be temporarily impacted when vehicles were driving up the canyon and recreational activities would shift from primitive to motorized forms. Hikers along the Safford-Morenci

Trail would also be adversely impacted. The natural values of the remainder of the WSA would also be permanently lost with nondesignation.

The cumulative effect of existing livestock facilities coupled with construction of planned wildlife and livestock facilities would result in the permanent loss of the naturalness of the WSA. The area presently contains so much evidence of man that if the planned facilities were constructed, the WSA would no longer retain its natural character and thus no longer be eligible for wilderness status.

Opportunities for solitude would also be temporarily impacted by military overflights and noises from the adjacent mine and smelter at Morenci, Arizona.

CONCLUSION. Nondesignation under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would result in the permanent loss of natural values throughout the WSA due to the implementation of an intensive livestock grazing system. If the only reasonable method of access to the state inholding is determined to be road access, the roadless and natural vaues of South Smith Canyon would also be significantly impacted.

All Wilderness would designate all 17,422 acres of Turtle Mountain WSA as wilderness, preserving the area's natural qualities and maintaining the outstanding opportunities for solitude and primitive recreation. The large size of the WSA, its shape and its topography and vegetation provide many places for the visitor to be alone and avoid the sights and sounds of other people. Specifically, Trujillo, Hot Springs and South Smith Canyons offer numerous secluded places. A variety of primitive recreational opportunities are outstanding—including hiking, backpacking, camping and hunting. Wilderness would also preserve the special features that enhance the wilderness quality of the WSA—raptor nesting sites and a portion of the historic Safford-Morenci Trail.

No other resource management activities such as livestock or wildlife habitat projects would be constructed in the area recommended for wilderness because the area already contains so much evidence of man that any further addition of man's work to the WSA would cumulatively impact the natural values of the WSA. Noise from the adjacent mine and smelter at Morenci, Arizona and military training overflights of the WSA would have temporary but minimal impacts on opportunities for solitude.

Turtle Mountain WSA includes three private inholdings and one state inholding for which reasonable access, if requested, would be granted. To facilitate implementation of an intensive livestock management system on the Turtle Mountain Allotment, a request for access to the state inholding is anticipated. If the only reasonable method of access to the inholding, to accomplish the intended use, is by vehicle access, it would permanently impair wilderness values in South Smith Canyon because vehicle access would require a road through the WSA at least 2.5 miles long.

During the wilderness review, vehicle access was requested to the state inholding in Guswedt Canyon in the eastern part of the WSA for ranching purposes. The request was granted under the authority of BLM's *Interim Management Policy*. While nearly all of the road was built on state land, a small part did cross the WSA, impacting the roadless and natural character of the WSA.

Including the WSA in the NWPS would expand the system's diversity by including vegetation types not now represented. The WSA lies in the Grama/Tobosa Shrubsteppe, Creosotebush/Bursage and Transition Potential Natural Vegetation Types. None of these types are now represented in the NWPS.

CONCLUSION. *All Wilderness* would preserve the wilderness characteristics of all 17,422 acres of Turtle Mountain WSA. Access to the state inholding would impair the wilderness character of South Smith Canyon if vehicular access were granted. Including Turtle Mountain WSA in the NWPS would expand the system's diversity by including vegetation types not currently represented. Wilderness designation provides an opportunity to expand the diversity of the NWPS.

Enhanced Wilderness would designate 9,104 acres as wilderness, 8,318 acres fewer than *All Wilderness*, but both alternatives would preserve the wilderness character and special features of Turtle Mountain and the canyons draining eastward to Eagle Creek. Under *Enhanced Wilderness* the wilderness boundaries would follow the Turtle Mountain ridgelines on the south and west, the ridgeline overlooking South Smith Canyon on the north and section and property lines on the east. As with *All Wilderness*, adequate access would have to be provided to the state inholding. Such a request is anticipated and the impacts of access to the inholding under this alternative would be the same as under *All Wilderness*. BLM has identified this inholding for acquisiton through exchange—which would eliminate the potential impact on the wilderness character of South Smith Canyon.

The impact of aircraft overflights, livestock management, wildlife habitat management and noise from the Morenci mine and smelter on the area recommended for wilderness would have the same impacts as under *All Wilderness*.

The natural qualities of the southern part of the WSA not recommended for wilderness would be impaired by construction of additional livestock waters.

CONCLUSION. *Enhanced Wilderness* would preserve the wilderness characteristics of 9,104 acres of the WSA but wilderness values would be lost in the southern part of the WSA not recommended for wilderness. Access to the state inholding in South Smith Canyon would impair roadless and natural values of the area if vehicular access were granted.

JAVELINA PEAK

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not designate any of Javelina Peak WSA as wilderness, resulting in minimal impacts to the natural qualities of the WSA and temporary impacts to opportunities for solitude and primitive recreation. Military training overflights would occur over the WSA but impacts to opportunities for solitude would be temporary, lasting about one minute. Off-road vehicle use of the dunes in the southern part of the WSA would continue, resulting in impacts to opportunities for solitude and primitive recreation. While ORVs are using the area, it would be difficult to find and experience solitude. As ORV use continues to increase, so would impacts to the natural qualities of the WSA. At current levels of use, impacts are minimal. Existing range and wildlife waters would be maintained but no new projects would be built and thus wilderness values would not be impacted.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would not designate any of Javelina Peak WSA as wilderness and the natural qualities would show increasing signs of ORV use. Military overflights and ORV use of the dunes would temporarily impact solitude and opportunities for primitive recreation.

The Whitlock Mountains in Javelina Peak WSA starkly contrast with the plains of the San Simon Valley.

All Wilderness would designate all 18,853 acres of Javelina Peak WSA as wilderness. Designation would preserve the WSA's natural qualities as well as its outstanding opportunities for solitude and primitive recreation. Varied topography, including numerous desert washes, rolling hills, highly eroded badlands and the mountainous topography of Javelina Peak combine to provide outstanding opportunities for solitude. This same topographic diversity enhances a variety of primitive recreational uses including hiking, horseback riding, rock collecting, rock scrambling, camping and sightseeing. Wilderness designation would also preserve some interesting special features, including scenic geologic formations, dunes of possible ecologic interest and two fossil resource sites.

Under *All Wilderness*, however, unauthorized ORV use would temporarily impact solitude around the cherrystem road to KMP Tank, powerline boundary road, southwestern boundary road (Haekel Road) and dunes in the southern part of the WSA. The flat terrain near these roads makes it easy for vehicles to leave the road and proceed cross-country into the WSA. Furthermore, the dunes in the southern portion of the WSA are an ORV use area on which BLM would have difficulty enforcing a motor vehicle ban. Unauthorized ORV use would disrupt the wilderness visitors' experience of solitude. Impacts to solitude resulting from unauthorized ORV use would be temporary, occurring only when vehicles were in the area.

No impacts to wilderness values are expected from the maintenance of range and wildlife facilities if existing methods of maintenance are used. Maintenance is permitted under wilderness management but must be carried out to achieve the objectives of wilderness as well as livestock and wildlife management. Military training overflights would have a temporary impact on solitude in the area designated wilderness but because the flights are temporary, impacts would not be significant.

Wilderness designation would expand the diversity of the NWPS. The WSA lies in the grama/tobosa shrubsteppe vegetation type that is not now represented in the wilderness system.

CONCLUSION. *All Wilderness* would preserve the wilderness values of all 18,853 acres of the Javelina Peak WSA. However, unauthorized ORV use would temporarily impact solitude in many parts of the area recommended for wilderness. Wilderness designation would expand the diversity of the NWPS.

Enhanced Wilderness would have impacts similar to those of *All Wilderness* but would preserve the wilderness values of only 7,035 acres, 11,818 acres less than *All Wilderness*. Scenic geologic features would be protected through wilderness management, but the dunes and fossils would not benefit from wilderness protection because they are in the southern part of the WSA not recommended for designation under this alternative. *Enhanced Wilderness* would preserve higher quality wilderness lands with less impact on solitude because lands easily accessible to ORVs would not be included in the area recommended for wilderness.

The 11,818 acres not recommended for wilderness would be impacted as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*. Military overflights and ORV use would impact opportunities for solitude, but only temporarily.

CONCLUSION. *Enhanced Wilderness* would preserve 7,035 acres of higher quality wilderness lands and eliminate most impacts to solitude resulting from ORV use. The natural qualities of the area not recommended for wilderness would show increasing signs of ORV use.

PELONCILLO MOUNTAINS

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would not designate any of the WSA as wilderness. There would be some minimal impairment of wilderness values, however, because the planned construction and maintenance of livestock and wildlife waters would result in small-scale, isolated, adverse impacts to the natural qualities of the WSA. Off-road vehicle use would continue on the vehicle ways in Little Doubtful Canyon and on the flats in the eastern part of the WSA, temporarily impacting opportunities for solitude and primitive recreation when ORVs were present. Use levels would be low and impacts infrequent.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would not designate any of the WSA as wilderness. Wilderness values, however, would be minimally impacted.

All Wilderness would designate all 12,317 acres of Peloncillo Mountains WSA as wilderness. Wilderness designation would preserve the natural qualities of an essentially unaltered landscape with excellent scenery in the highly dissected mountains, numerous cliffs and winding canyons. These features enhance the overall wilderness quality of the WSA. Wilderness management would ensure the continued opportunity for the visitor to experience solitude and primitive and unconfined forms of recreation. The rugged mountains and numerous canyons would be preserved, continuing the opportunity for a visitor to find a secluded spot. Wilderness designation would also ensure the continued opportunity for hiking, backpacking, rock scrambling and sightseeing, as well as hunting in the higher country.

The wilderness values preserved under *All Wilderness* would be adversely impacted because of the irregular land ownership pattern. Adjacent land uses that are not compatible with wilderness would result in impairment of the naturalness and opportunities for solitude found in the WSA. The duration of these impacts would vary depending upon the type of land use. The likelihood of incompatible adjacent land uses is difficult to predict, but preservation of the wilderness character of the WSA cannot be ensured over the long term with the existing land ownership pattern. Vehicle use of the cherrystem roads in Ward and Little Doubtful Canyons would temporarily impair the solitude found in these canyons. In addition, unauthorized ORV use on the lowlands of the extreme eastern portion of the WSA in New Mexico would result in temporary impacts to solitude. Minor impacts to wilderness values are anticipated from construction and maintenance of livestock and wildlife waters. The small-scale, isolated nature of the projects and compatible maintenance methods, however, would keep the impacts minimal.

Including the WSA in the NWPS would further expand the diversity of the system by adding the oak-juniper woodland vegetation type. This vegetation type is currently represented by two designated and four administratively endorsed wilderness areas.

CONCLUSION. Under *All Wilderness* irregular land ownership patterns would result in adverse impacts to wilderness values if incompatible adjacent land uses occurred. The likelihood of incompatible adjacent land uses is difficult to predict but preservation of the wilderness character of the lands recommended for wilderness cannot be insured over the long term with the existing ownership pattern. Minor impacts to wilderness values would occur from construction and maintenance of range and wildlife waters. including Peloncillo Mountains WSA in the NWPS would further expand the diversity of the National Wilderness Preservation System.

Enhanced Wilderness would preserve 10,418 acres of Peloncillo Mountains WSA as wilderness, 1,899 acres less than *All Wilderness*. Left undesignated would be the lowlands of the WSA's eastern portion and land that are of lesser wilderness quality impacted by cherrystem roads, vehicle ways and livestock facilities. In the area designated wilderness, *Enhanced Wilderness* would have impacts similar to those expected under *All Wilderness*, except that unauthorized ORV activity would not be a problem as these use areas would not be recommended for wilderness under this alternative. Impacts resulting from irregular boundaries would be compounded by a boundary even more irregular than that proposed under *All Wilderness*. The wilderness area would be nearly cut in half by not designating lands around Little Doubtful Canyon.

CONCLUSION. *Enhanced Wilderness* would designate lands with higher quality wilderness values and would exclude areas where solitude would be impacted by ORV use. The wilderness boundary, however, would be even more irregular than under *All Wilderness*, resulting in the increased possibility for adverse impacts caused by incompatible adjacent land uses.

DOS CABEZAS MOUNTAINS
(Formerly Happy Camp Canyon)

Proposed Action and *Moderate Wilderness* would designate 11,998 acres of higher quality wilderness lands as wilderness, preserving the natural values and special features of Happy Camp, Ninemile Creek and Sheep Canyon watersheds. The special features include scenic views, riparian areas, historic sites and interesting geologic formations. These alternatives would also preserve the outstanding opportunities for solitude and primitive recreation in the area recommended for wilderness.

These alternatives would prohibit ORV use in Happy Camp and Howell Canyons, improving opportunities for solitude as the noise and views of ORVs would not occur in these parts of the area recommended for wilderness. The planned maintenance of livestock and wildlife habitat facilities would not adversely impact wildernss values because traditional maintenance methods would not be incompatible with wilderness values. Military aircraft overflights would cause short-term and temporary impacts to opportinities for solitude in the area recommended for wilderness.

The extreme western part of the WSA (Buckeye Canyon), not recommended for wilderness, would be impacted by development of Buckeye and Apache Mines. On-hundred fifteen acres of surface disturbance, including road construction, mine waste and an aerial tram would impair the natural and roadless values of this part of the WSA. Operations at the mines would impair opportunities for solitude during on-going operations. Due to the extremely steep and rocky nature of this part of the WSA, disturbance to natural values would be permanent. The remaining nondesignated lands would not be adversely affected.

Including the WSA in the NWPS would expand the diversity of the system by adding the grama/tobosa shrub-steppe vegetation type, not now represented, and the oak-juniper woodland, represented by two designated and four administratively endorsed wilderness areas.

CONCLUSION. *Proposed Action* and *Moderate Wilderness* would preserve 11,998 acres of the WSA with the highest quality wilderness values. Impacts from other quality resource uses would not adversely impact the area recommended for wilderness. In Buckeye Canyon, part of the WSA not recommended for wilderness, development of the Buckeye and Apache Mines would permanently impair 115 acres of the WSA.

All Wilderness would designate as wilderness all 18,509 acres of Dos Cabezas Mountains WSA, preserving the WSA' natural qualities and special features, scenic views, irparian areas, historic sites and geologic formations. *All Wilderness* would also maintain the outstanding opportunities for solitude provided by the WSA's moutains and canyons, as well as outstanding primitive recreation opportunities for hiking, backpacking, camping and rock scrambling.

Impacts to naturalness and solitude would result from development of the Buckeye and Apache Mines in the western part of the area recommended for wilderness. In this rugged environment, reclamation would not preserve the area's natural qualities. No impacts are expected from the maintenance of range and wildlife facilities, since existing methods are compatible with wilderness objectives. Military training flights over the area recommended for wilderness would impact opportunities for solitude but the impact would not be significant because it is temporary, lasting about one minute. Off-road vehicle use in Happy Camp, Howell, Sheep and Wood Canyons would be prohibited, improving opportunities for solitude in these canyons. Without the noise and views of ORVs, opportunities for solitude would be easily obtained.

Including the WSA in the NWPS would expand the diversity of the system by adding the grama/tobosa shrub-steppe vegetation type, not now represented and the oak-juniper woodland vegetation type, represented by two designated and four administratively endorsed wilderness areas.

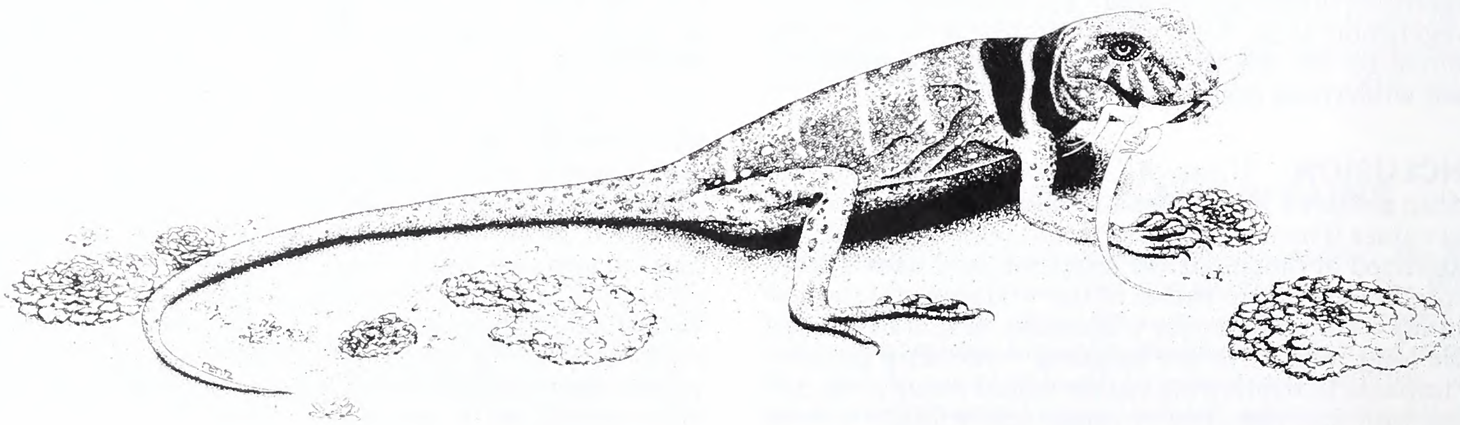
CONCLUSION. *All Wilderness* would preserve the wilderness qualities of all of Dos Cabezas Mountains WSA except for impacts from mineral development of the Buckeye and Apache Mines in the western part. Other resource uses would not impact the wilderness values of the recommended area.

Enhanced Wilderness would designate 14,555 acres as wilderness, excluding from preservation lands with mineral potential in the western part of the WSA. Impacts under *Enhanced Wilderness* would be similar to those under *All Wilderness* but would preserve 3,954 fewer acres, excluding lands of lower wilderness quality. Excluded from protection in the WSA would be old mine workings, vehicle ways and other human imprints in the western part along Buckeye Canyon and in the southern part near Wood Canyon.

CONCLUSION. *Enhanced Wilderness* would preserve 14,555 acres of higher quality wilderness values in the WSA and reduce impacts to wilderness values.

No Wilderness would not designate the Dos Cabezas Mountains WSA as wilderness. As a result, the natural qualities of the western part of the WSA around Buckeye Canyon would be lost. Mining in this area of high mineral potential would severely impair the area's natural character through road construction and surface disturbance. Reclamation in this rugged environment would not return the wilderness values of the WSA. Opportunities for solitude would also be severely impacted during on-going mining activities. Maintenance of livestock and wildlife facilities would not adversely affect the wilderness character of the WSA because existing methods of maintenance would be compatible with wilderness objectives. Aircraft overflights and ORV use would impact opportunities for solitude but impacts would be temporary.

CONCLUSION. *No Wilderness* would result in significant impairment of wilderness values in the western part of the WSA around Buckeye Canyon, an area of high mineral potential. The remainder of the WSA would not be adversely impacted.



IMPACTS ON MINERALS AND ENERGY

Designating an area as wilderness would close it to all new claim staking, prospecting and exploring under the mining laws, subject to valid existing rights. Mining activities would continue only on those claims located and containing a valid discovery as of the date of wilderness designation. See Table 4-2 for the number of mining claims filed by WSA as of July 1986.

Minerals would not be leased in designated wilderness areas, but leases issued before designation could be developed subject to the terms and conditions of the lease. Since nearly all leases within the WSAs contain wilderness protection stipulations, any exploration and development within a designated wilderness area would not be allowed to impair wilderness values. See Table 4-3 for acres under lease by WSA as of July 1986. No geothermal leases exist in any WSA as of July 1986.

The total impact of a wilderness designation on mineral and energy exploration and development would never be known. Although the U.S. Geological Survey and the Bureau of Mines conduct mineral surveys on areas preliminarily recommended suitable for wilderness, an area's economic mineral resource potential would never be fully known at any one time because of changing economic conditions and technology. Designation would not impact an area lacking mineral values, but the impact would be immeasurable if an area had significant mineral values. Even after discovery is made, years may be needed to determine the nature of a deposit. The chances of an initial discovery occurring after wilderness designation would be nearly nonexistent.

Based upon the Chapter 3 discussion of the general geology, current hardrock minerals and energy situation and potential for mineral and energy development in each WSA, the interdisciplinary team determined that there would be little or no potential for development of hardrock minerals or energy resources in Needle's Eye, Fishhooks, Day Mine, Gila Box, Turtle Mountain, Javelina Peak and Peloncillo Mountains WSAs. As a result, there would be no significant impact on mineral and energy development in these WSAs and they will not be discussed further in this section of Chapter 4. Chapter 2 projects development of a mine in Black Rock WSA and a mine in Dos Cabezas Mountains WSA. The following is an analysis of the impacts to mineral development in these WSAs by alternative.

BLACK ROCK

Proposed Action and *Moderate Wilderness* would recommend part of the WSA as wilderness, thus closing that part to new claim staking, prospecting, exploring and energy leasing under the mining laws, subject to valid existing rights. Impacts to the development of minerals and energy would not be significant, however, because the potential for mineral development is low and the potential for oil and gas and geothermal energy is zero.

In the area not recommended for wilderness, a small mine would be developed north of Jackson Mountain, unconstrained by wilderness management. About 10 surface acres would be disturbed by road construction and mine development.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would have no significant impact on mineral

TABLE 4-2
MINING CLAIMS IN AREAS PROPOSED FOR WILDERNESS DESIGNATION*

Bureau of Land Management
Safford District, Arizona

	Proposed Action	All Wilderness**	Enhanced Wilderness	Moderate Wilderness	No Wilderness
Needle's Eye	17	22	22	17	0
Black Rock	0	6	0	0	0
Fishhooks	4	36	36	4	0
Day Mine	0	1	1	0	0
Gila Box	0	29	29	29	0
Turtle Mountain	0	0	0	0	0
Javelina Peak	0	0	0	0	0
Peloncillo Mountains	0	0	0	0	0
Dos Cabezas Mountains	24	134	17	24	0
Total	45	228	105	74	0

*As of July 1986.

**Number of claims may not equal that shown on Maps 1 through 9 because many claims cross section lines.

Source: Safford District Files.

TABLE 4-3
ACRES UNDER OIL AND GAS LEASE*

Bureau of Land Management
Safford District, Arizona

	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness
Needle's Eye	0	0	0	0	0
Black Rock	0	0	0	0	0
Fishhooks	0	0	0	0	0
Day Mine	0	0	0	0	0
Gila Box	0	0	0	0	0
Turtle Mountains	0	0	0	0	0
Javelina Peak	0	0	0	0	0
Peloncillo Mountains	0	300	0	0	0
Dos Cabezas Mountains	995	1,026	1,026	995	0
Total	995	1,326	1,026	995	0

*As of July 1986.
Source: Safford District Files

and energy exploration and development because little or no potential exists for these resources. In the area not recommended for wilderness, a small mine would be developed.

All Wilderness would have the same impacts on mineral and energy development as the *Proposed Action* and *Moderate Wilderness*. The mine north of Jackson Mountain would still be developed in the area recommended for wilderness because a valid discovery, and therefore a valid existing right, would be established by the date of wilderness designation.

CONCLUSION. There would be no impact on mineral and energy development under this alternative because little or no potential exists for mineral or energy resources. Because a valid discovery would be established for the mine north of Jackson Mountain, it would be developed in the area recommended for wilderness.

Enhanced Wilderness would have the same impact on minerals and energy as the *Proposed Action* and *Moderate Wilderness* except that the area closed to entry would be 7,614 acres, 1,024 acres more than under the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on minerals and energy development as the *Proposed Action* and *Moderate Wilderness*. There would be no significant impact.

No Wilderness (No Action) would have no impact on mineral and energy exploration and development. Future prospecting, exploration and development would proceed unaffected by wilderness management.

CONCLUSION. There would be no impact on mineral and energy development under *No Wilderness (No Action)*.

DOS CABEZAS MOUNTAINS

Proposed Action and *Moderate Wilderness* would close 11,998 acres to entry under the mining and mineral leasing laws, subject to valid existing rights. The number of mineral occurrences in and around the WSA shows strong potential for mineral development. Because no development would occur in the area recommended for wilderness, the *Proposed Action* and *Moderate Wilderness* would have no significant impact on mineral or energy development. In the Buckeye Canyon area not recommended for wilderness, a mine would be developed and minerals produced. Because the operation is outside the area recommended for wilderness, there would be no impact on its development.

CONCLUSION. There would be no impact on mineral or energy development in the area recommended for wilderness. The mine in Buckeye Canyon, an area not recommended for wilderness, would be developed with no impact from wilderness management.

All Wilderness would have the same impact on mineral development as the *Proposed Action* and *Moderate Wilderness*. The mine in Buckeye Canyon would still be developed in the area recommended for wilderness because a valid discovery and, therefore, a valid existing right, would be established by the date of wilderness designation.

CONCLUSION. There would be no impact on mineral or energy development because the only development expected would be in Buckeye Canyon where a valid existing right would be established for the projected mine. Because the valid right would exist, the mineral development would be allowed to continue inside the area recommended for wilderness.

Enhanced Wilderness would have the same impact on mineral or energy development as the *Proposed Action* and

Moderate Wilderness except that the area closed to mineral and energy entry would be 14,555 acres, 2,634 acres more.

CONCLUSION. *Enhanced Wilderness* would have the same impact on mineral or energy development as the *Proposed Action* and *Moderate Wilderness* except that the area closed to mineral and energy entry would be 2,634 acres more.

No Wilderness (No Action) would have no adverse impact on mineral or energy development. Future prospecting, exploration and development would proceed unaffected by wilderness management.

CONCLUSION. There would be no impact on minerals and energy development under *No Wilderness (No Action).*

IMPACTS ON LIVESTOCK GRAZING

Livestock grazing in an area before wilderness designation would continue. Grazing would not be phased out simply because an area were designated wilderness and numbers of livestock permitted to graze in wilderness would remain at approximately the same levels as before designation. Changes in numbers would be a result of changes in rangeland condition and would be consistent with wilderness management objectives. Maintenance of existing livestock facilities and construction of new ones would be permitted if the proposed project meets the objectives of both the wilderness and livestock management plans. Under certain circumstances, the use of motor vehicles and mechanized equipment would also be permissible.

Wilderness management, however, could constrain livestock grazing. While wilderness designation itself would not directly affect livestock numbers, a grazing allotment in a designated wilderness would have to be managed to preserve wilderness values. Indirectly, wilderness management may affect livestock numbers if changes in grazing systems or additional management facilities are not permitted because of their impacts on wilderness values. Because livestock management goals and objectives are specific to individual grazing allotments, the impacts of wilderness management would vary, depending on the livestock management actions proposed.

With the completion of the Upper Gila-San Simon Grazing EIS (BLM 1978), management goals were established for each of the 34 grazing allotments in the WSAs. The purpose of these goals was to maintain those allotments already in good condition and to improve those allotments where the amount and quality of livestock forage (condition) was poor or fair. To improve the range condition, the following objectives were developed:

- balance livestock numbers with available forage supply;
- reduce average forage utilization (plant use);
- improve uniformity of forage utilization (livestock distribution); and
- provide for periods of rest through grazing systems.

Depending on the specific problems of an allotment, any or all of these objectives would apply. To accomplish these objectives, a variety of range management activities have been proposed, including building of fences, water developments, corrals, line cabins, roads and stock trails (see Table 3-8).

The following is an analysis of impacts by WSA for each alternative. In every case but one (the Little Doubtful Allotment — see Table 3-7), the allotments in the WSAs were only portions of the total allotments: the total allotment includes land within and outside the WSA. Percentage of the allotment in the WSA varied from one to 100 percent. This situation makes it difficult to assess the impacts in the WSA portion of the allotment separately from the entire allotment. Allotments are integral units and livestock use and practices in one portion of an allotment have an impact on livestock management in other portions of the allotment.

No livestock facilities or changes in grazing systems (beyond those already authorized) are proposed for the allotments in Gila Box, Javelina Peak or Peloncillo Mountains WSAs. As a result, livestock grazing would not be affected by wilderness designation and is not discussed further. BLM, however, continually monitors allotment management plans (AMPs) for their effectiveness. If problems develop or objectives are not realized, management may need to be changed. Such changes may involve livestock facilities, and construction would have to conform to livestock and wilderness management plans.

Following is an analysis of impacts to livestock grazing by affected WSA and alternatives.

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would have no significant impact on the existing grazing system or range condition in the Mescal Mountain Allotment because most planned facilities (four miles of fence along the Reservation boundary) would be built and livestock numbers would not be affected. Under these alternatives the proposed road and corral would not be built because of adverse impacts to wilderness values, but livestock numbers and the grazing system would remain unchanged. Range condition would improve with improved cattle distribution and forage utilization prescribed in the grazing system. The vehicle way in the extreme eastern part of the WSA would form the boundary of the area recommended for wilderness and it would be rebuilt, improving livestock gathering operations. Cattle would have to be driven one-half to one mile less.

These alternatives would have no impact on the Christmas Allotment as very little use is in the WSA and no livestock facilities are proposed. The allotment condition is excellent and these alternatives would have no impact on existing livestock numbers or range condition.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would not adversely impact the grazing operations in the area recommended for wilderness, as most planned facilities would be built and livestock numbers would be unaffected. Range condition would improve.

All Wilderness and *Enhanced Wilderness* would have the same impact as the *Proposed Action* and *Moderate Wilderness*, except that the vehicle way in the eastern part of the area recommended for wilderness would not be used by motor vehicles for livestock gathering operations because motor vehicles are not permitted in designated wilderness.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would not adversely impact livestock operations or range condition in the WSA.

No Wilderness would have no adverse impact on the range condition, grazing systems or cattle numbers in either the Christmas or Mescal Mountain Allotments. This alternative differs from *All Wilderness* and *Enhanced Wilderness* in that vehicle use of the way in the eastern part of the WSA and road construction to Dick Spring would be permitted. Additional vehicle access would make the ranching operations easier.

CONCLUSION. *No Wilderness* would have no impact on livestock grazing and would permit road construction to Dick Spring. Additional vehicle access would better facilitate shipment of cattle.

BLACK ROCK

Proposed Action and *Moderate Wilderness* would not adversely impact the Black Rock, Spenazuma/Holdup Canyon or Jackson Mountain allotment. Because no additional range facilities are planned and livestock numbers would remain the same, there would be no significant impact on Black Rock or Jackson Mountain Allotments. In Spenazuma/Holdup Canyon Allotment, livestock distribution is a problem. To solve this problem, two miles of fence and two water developments have been authorized and one-half mile of stock trail is proposed. Under these alternatives, the fence would be built in the area recommended for wilderness and the water developments and stock trail would be built in that part of the WSA not recommended for wilderness. The result would be no adverse impact on livestock grazing in the allotment and range condition would improve through better livestock distribution.

CONCLUSION. Under the *Proposed Action* and *Moderate Wilderness*, there would be no adverse impact on livestock operations. Range facilities needed for better livestock distribution would be built and range condition would improve.

All Wilderness would have the same impacts on livestock grazing as the *Proposed Action* and *Moderate Wilderness* except all range facilities necessary to improve livestock

A prominent volcanic feature, Black Rock rises on the edge of the Santa Teresa Mountains on the northwest side of Black Rock WSA.

distribution would be constructed in the area recommended for wilderness. The result would be improved livestock distribution, forage utilization and range condition.

CONCLUSION. *All Wilderness* would have no adverse impact on livestock grazing. Needed range facilities would be built and range condition would improve.

Enhanced Wilderness would cause the same impacts on livestock grazing as under the *Proposed Action* and *All Wilderness* — no significant impact. Range condition would improve.

CONCLUSION. *Enhanced Wilderness* would not impact livestock grazing and range condition would improve.

No Wilderness (No Action) would have no impact on implementation of grazing systems or livestock numbers in any of the allotments. Grazing systems would be implemented unaffected by wilderness management and range condition would improve.

CONCLUSION. *No Wilderness (No Action)* would have no impact on livestock grazing or cattle numbers in any of the allotments. Range condition would improve.

FISHHOOKS

Proposed Action and Moderate Wilderness. Only one of the three allotments in the WSA is in the area recommended for wilderness — Diamond Bar. Two allotments are in the area not recommended for wilderness under these alternatives—Day Mine and Tom Springs. These alternatives would have no adverse impact on livestock grazing in the Tom Springs Allotment because the grazing system is implemented and working satisfactorily. No changes to the grazing system or range facilities are planned. Because the allotment is in good condition, livestock use would increase 53 AUMs (about four cows per year) with no adverse impact on range condition.

The topography in the entire Diamond Bar Allotment is diverse, extending from the Gila River to the crest of the Gila Mountains. The problem in this allotment is that livestock are primarily using only the gentler, lower elevation country outside the WSA. Cattle use outside the WSA is heavier than desired while use inside the WSA is light. Under these alternatives there would be no impact on livestock grazing. One mile of fence and three spring developments would be built, resulting in improved livestock distribution, forage utilization and range condition. Under these alternatives there would be increased use in the WSA and range condition in the entire allotment would improve. The pipeline and catchment in upper Fishhook Canyon would not be built due to impacts on the natural values and special features (near-climax plant communities) of the area recommended for wilderness, but there would be no effect on livestock numbers, the grazing system or range condition.

A small portion of the Day Mine Allotment, in that part of the WSA not recommended for wilderness, is experiencing the same problems as the Diamond Bar Allotment. Livestock use in the WSA is light and maintenance of the dirt reservoir would provide water for more even distribution of livestock over the entire allotment. Under the *Proposed Action* and *Moderate Wilderness* there would be no impact on the grazing system or livestock numbers because the dirt reservoir would be maintained, providing water for livestock, better distribution of cattle and preservation of good range condition.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would have no adverse impact on livestock grazing in the WSA. Grazing systems would be implemented, most needed facilities built and levels of livestock use unchanged or increased slightly. The result would be better livestock distribution, forage utilization and range condition.

All Wilderness and *Enhanced Wilderness* would have essentially the same impact on livestock grazing as the *Proposed Action* and *Moderate Wilderness.* The only difference would be that all allotments would be located in the area recommended for wilderness. Grazing systems would be implemented, however, with most needed range facilities resulting in better livestock distribution, forage utilization and range condition.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would have no adverse impact on livestock grazing and range condition would improve.

No Wilderness (No Action) would have no impact on the livestock grazing in any of the allotments. Grazing systems would be implemented and necessary facilities built, resulting in better livestock distribution, forage utilization and range condition. The pipeline and catchment would not be built in Upper Fishhook Canyon because of adverse impacts to special vegetation communities in the canyon.

CONCLUSION. *No Wilderness (No Action)* would not impact any of the allotments. Grazing systems would be implemented and range condition would improve.

DAY MINE

Proposed Action, Moderate Wilderness and *No Wilderness (No Action).* Day Mine Allotment is the only allotment in the WSA. As with many other allotments, distribution of cattle throughout the whole allotment is not being achieved, resulting in uneven forage utilization. Under these alternatives, there would be no impact on livestock grazing because the necessary fence, water developments and stock trail would be built to implement a grazing system, improving livestock distribution and range condition.

CONCLUSION. These alternatives would have no adverse impact on livestock grazing. All range facilities needed to implement a grazing systems would be built, improving livestock distribution and range condition.

All Wilderness would have the same impact on livestock grazing as the *Proposed Action* and *Moderate Wilderness*. Even though the WSA would be designated wilderness, a grazing system would be implemented and needed fences, waters and stock trail would be built, resulting in improved range condition.

CONCLUSION. *All Wilderness* would have no impact on livestock grazing and range condition would improve.

Enhanced Wilderness. In both that part of the WSA recommended for wilderness and that part not recommended, *Enhanced Wilderness* would not impact livestock grazing. Needed range facilities would be built to implement a grazing system and livestock distribution and range condition would improve.

CONCLUSION. *Enhanced Wilderness* would have no impact on livestock grazing and range condition would improve.

TURTLE MOUNTAIN

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)*. Parts of three allotments are in Turtle Mountain WSA: Bonita Creek, Turtle Mountain and Bull Gap Community. These alternatives would have no impact on livestock grazing or cattle numbers. Grazing systems and livestock facilities would be implemented on the Bull Gap and Turtle Mountain allotments, improving forage utilization, livestock distribution and range condition. No changes or range facilities are needed in the Bonita Creek Allotment so these alternatives would have no impact on livestock grazing in that allotment.

CONCLUSION. These alternatives would have no impact on livestock grazing. Livestock distribution, forage utilization and range condition would improve.

All Wilderness. Under this alternative Bonita Creek Allotment would not be impacted. The allotment, in the WSA, is in good condition, all necessary facilities have been implemented and the grazing system is working. *All Wilderness* would have no impact on the grazing system, livestock numbers or range condition.

Bull Gap Community Allotment has livestock distribution problems. Cattle are using forage too heavily in the southern part of the allotment and underusing forage in the steeper northern part of the allotment within the area recommended for wilderness. A pipeline system is proposed in the recommended area to allow cattle to use available forage. Without the water and a grazing system that provides periodic rest to portions of the allotment, livestock numbers would have to be reduced to improve range condition. Since the recommended area currently contains the maximum evidence of man's work to still be considered natural, the addition of this pipeline system would cumulatively impact the WSA to the point where it would no longer be considered natural. Thus the WSA would no longer qualify for wilderness consideration. Since the pipeline system would not be installed, the number of livestock permitted to graze the entire allotment would be reduced 213 AUMs (49 AUMs within the area recommended for wilderness) to improve range condition.

Turtle Mountain Allotment also has utilization and distribution problems. Cattle are overusing drainage bottoms within the area recommended for wilderness and underusing the steep sideslopes and ridgetops since there is no water in these locations. Several waters, fence and stock trails are proposed to provide water to dry parts of the area recommended for wilderness and to provide access to the sideslopes and ridgetops. Without the facilities and the grazing system, livestock numbers would be reduced to improve range condition. Since no more development can occur within the WSA without adverse impacts to the natural qualities, these facilities would not be constructed and livestock numbers would be reduced 447 AUMs in the entire allotment (250 AUMs are in the WSA). Without the facilities, livestock numbers must be reduced if range condition is to improve.

CONCLUSION. *All Wilderness* would have an adverse impact on livestock grazing in Bull Gap Community and Turtle Mountain Allotments. Cattle are poorly distributed in the Bull Gap Community Allotment. A water system required in Bull Gap Community Allotment would not be permitted, resulting in a reduction of 213 AUMs. In the Turtle Mountain Allotment, the needed range improvements and water system would not be allowed, resulting in a 447-AUM reduction. Bonita Creek Allotment would be unaffected by this alternative.

Enhanced Wilderness would have no impact on livestock grazing in the Bonita Creek or Bull Gap Community Allotments since these allotments are not in the area recommended for wilderness. Livestock waters would be constructed in Bull Gap Community Allotment, improving cattle distribution, forage utilization levels allotment-wide and range condition. Turtle Mountain Allotment would be impacted as described under *All Wilderness*.

CONCLUSION. *Enhanced Wilderness* would have no impact on the Bonita Creek or Bull Gap Community Allotments. Turtle Mountain would be impacted as described in *All Wilderness*.

DOS CABEZAS MOUNTAINS

In the Sheep Canyon Allotment, three miles of pasture fence are proposed to implement a grazing system. The system is needed to give periodic rest to portions of the allotment and improve range condition. Under all alternatives, the fence would be built and the grazing system implemented. As a result, range condition would improve.

None of the other allotments in the WSA would be impacted by any of the alternatives.

CONCLUSION. A grazing system would be implemented in the Sheep Canyon Allotment, improving range condition. No other allotments in the WSA would be affected by any of the alternatives.

IMPACTS ON RECREATION

Wilderness designation would preserve and enhance opportunities for primitive and unconfined recreation such as hiking, backpacking, hunting, sightseeing, rock scrambling and environmental study. Recreation dependent on motorized vehicles or equipment would not be permitted in designated wilderness areas. There are opportunities for both primitive and motorized forms of recreation in each WSA.

The most common recreation activity in all WSAs is hunting, which is often associated with camping and vehicle access. Although hunting and camping are compatible with wilderness, vehicle access would be confined to existing roads. Overland travel and use of vehicle ways would not be permitted.

Following is an analysis of the impacts to recreation by WSA and alternative.

NEEDLE'S EYE

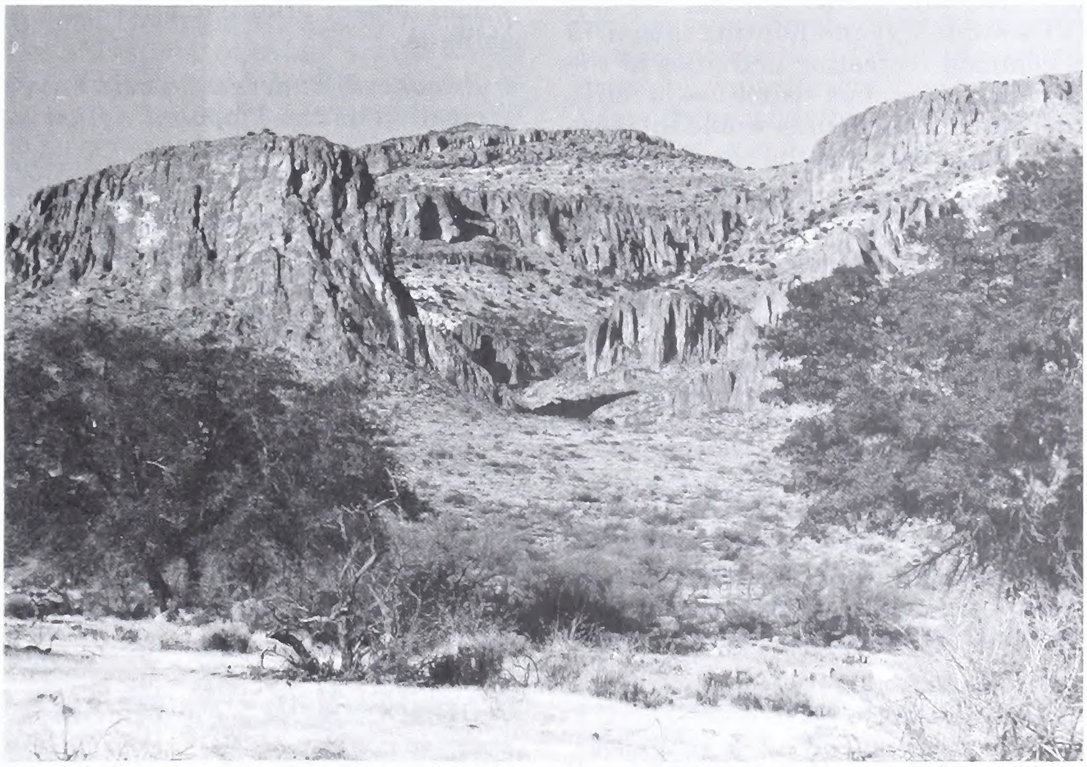
Proposed Action and *Moderate Wilderness* would have no adverse impact on recreation uses. While the wilderness would be closed to ORV use, the current use in Needle's Eye WSA is on existing roads and a vehicle way in the eastern part of the WSA. Since these routes form the boundary of the area recommended for wilderness, there would be no impact on the existing use (fewer than 50 recreation visitor days — RVDs — per year).

Primitive uses like hunting, fishing and hiking/backpacking (250 RVDs per year) would continue and increase to about 500 RVDs annually over the next 10 years (a 100% increase).

Other existing land uses would not have significant impacts on recreation use. Military overflights and helicopter flights to survey the powerline for maintenance needs would impact the solitude wilderness visitors seek. The flights, however, are brief. Livestock exclosure fences built along the Gila River and Mescal Creek would improve riparian wildlife habitat. The result would be improved opportunities for hunting and wildlife observation.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would have no impact on existing recreation uses, including ORV use. Primitive recreation uses would increase 250 RVDs per year over the next 10 years. Existing military and utility uses would temporarily impact recreation use but wildlife habitat improvement projects would increase opportunities for hunting and wildlife viewing.

All Wilderness and *Enhanced Wilderness* would prohibit ORV use of the vehicle way in the extreme eastern part of the area recommended for wilderness. As a result the existing use, fewer than 50 recreation visitor days (RVDs) per year, would have to shift to nearby areas. Use of this way for access for hunting and fishing activities would also be adversely impacted. Access to the WSA for hunting and to the river for fishing would have to be rerouted to the road along the Gila River, which is quite often under water from releases from Coolidge Dam. Closure of this way would result in a shift from motorized recreation activities to primitive forms of recreation such as hiking. Primitive uses (hunting, fishing and hiking/backpacking—250 RVDs per year) would continue and increase to about 500 RVDs annually over the next ten years. Access to the west end of the recommended wilderness would continue on the western boundary road.



Scenic views of rocky crags and cliffs occur throughout Peloncillo Mountains WSA.

Existing military, utility and wildlife management activities would have the same impact as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would enhance opportunities for solitude and primitive recreation and preclude vehicle use of the way in the eastern part of the area recommended for wilderness. Existing hunting and fishing would continue in the eastern part of the recommended wilderness, but access for these activities would change from vehicle to foot or horse travel. Access to the western part of the recommended area would continue along the western boundary road.

No Wilderness (No Action) would result in increased vehicle access and motorized recreation. Under this alternative, a ranch road would be constructed from the vehicle way in the eastern part of the WSA to Dick Spring. This road would provide further access to a previously roadless part of the WSA and would provide additional opportunities for ORV travel, hunting and camping. Opportunities for primitive recreation, including hiking and backpacking and opportunities for solitude would decrease.

Existing military, utility and wildlife management activities would continue with the same impacts as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *No Wilderness (No Action)* would result in increased vehicle access and motorized recreation. Construction of a ranch road to Dick Spring would enhance motorized recreation activities at the expense of primitive recreation activities.

BLACK ROCK

Proposed Action and *Moderate Wilderness*. Hiking and backpacking (150 RVDs annually) and hunting (about 75 RVDs annually) are common recreation activities in the area recommended for wilderness, but visitor use is fairly light. Under these alternatives, these uses would increase to a total of about 1,000 RVD annually in the next ten years.

About 50 RVDs of ORV use occurs annually in the area recommended for wilderness. These alternatives would prohibit ORV travel in Fourmile Canyon and the use would shift to other nearby areas. Hunters would have to access the area by foot or horseback. With ORV use precluded, these alternatives would enhance hiking, backpacking and backcountry hunting opportunities since the BLM area recommended for wilderness and the Forest Service wilderness together would provide 33,370 acres well suited for these activities. Relocation of the Black Rock Creek trailhead away from private property to public lands off the Fisher Basin Road (northern boundary road) and routing hikers and backpackers into the Santa Teresa Mountains at Fourmile Canyon would help reduce conflicts between recreationists and private landowners on Black Rock Road.

Other land uses would not significantly impact recreation activities in the area recommended for wilderness. Aircraft overflights (about 5,000 feet above ground level) would have a minimal, temporary impact on solitude. Livestock exclosure fences on Black Rock Creek would improve wildlife habitat and opportunities for wildlife observation and hunting. In the area not recommended for wilderness, development of a mine north of Jackson Mountain would impact most recreation uses in the immediate vicinity of the access road and mining operation due to the activity and noises associated with the mine.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would close the Fourmile Canyon way to ORV use. With ORV use precluded, Fourmile Canyon would provide an alternate means of back-country access to the Santa Teresa Wilderness and help lessen conflicts between recreationists and private landowners along Black Rock Road. These alternatives would enhance opportunities for primitive recreation and use would increase substantially over the next ten years. Continued military over-flights would have a minimal impact on recreation use. Wildlife habitat improvement projects would increase opportunities for wildlife observation and hunting. In the area not recommended for wilderness, recreation opportunities would be adversely impacted by a mining operation.

All Wilderness would have the same impact on recreation as the *Proposed Action* and *Moderate Wilderness* except that the mine north of Jackson Mountain would be in the area recommended for wilderness. As a result, opportunities for primitive recreation and solitude would be adversely impacted by the activity and noise created by the mining operation. These impacts, however, would be confined to a relatively small area near the eastern boundary of the recommended area.

CONCLUSION. *All Wilderness* would have the same impacts on recreation as the *Proposed Action* and *Moderate Wilderness* except the mine north of Jackson Mountain would be in the area recommended for wilderness and would impact primitive recreation and opportunities for solitude.

Enhanced Wilderness would have the same impacts to recreation as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *Enhanced Wilderness* would have the same impacts to recreation as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action). Under this alternative, the Fourmile Canyon way would be used by ORVs, providing further vehicular access to the east side of the WSA and the Santa Teresa Mountains. Off-road vehicle travel and access for hunting would increase. Additional access for backcountry hiking would remain but opportunities for solitude in the area of the way would be impacted by vehicle use. Recreation use in the remainder of the WSA would remain essentially unchanged with impacts the same as described for the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *No Wilderness (No Action)* would result in continued ORV use of the Fourmile Canyon vehicle way. Off-road vehicle travel and access for hunting would increase at the expense of backpacking and hiking. In the remainder of the WSA, impacts would be the same as described for the *Proposed Action* and *Moderate Wilderness*.

FISHHOOKS

Proposed Action and *Moderate Wilderness*. Recreation use in Fishhooks WSA is mainly hunting and some ORV use on vehicle ways in Dutch Pasture and Lower Fishhook Canyons. These alternatives would prohibit ORV travel on these two ways but impacts would not be significant because annual use totals only 50 recreation visitor days (RVD) annually and access for hunting would still be available along the southwestern boundary road of the area recommended for wilderness.

These alternatives would provide additional opportunities for primitive recreation in a natural, undisturbed setting. Hiking and other wilderness use levels are unknown but considered low. In the next ten years, wilderness recreation use would increase to about 500 RVDs annually.

Existing military overflights would have an adverse impact on primitive uses and solitude, but brief and temporary as flights last only about one minute. Maintenance of riparian exclosures in Lower Fishhook Canyon would improve wildlife habitat and increase opportunities for hunting and wildlife observation.

In the area not recommended for wilderness, recreation use would not change from the existing hunting and vehicle travel on the cherrystem road in the eastern part of the WSA.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would prohibit ORV use in Dutch Pasture and Lower Fishhook Canyons. The impact would be insignificant because use levels are estimated to be about 50 RVDs annually. These alternatives would enhance primitive recreation opportunities which would increase to about 500 RVDs per year in the next 10 years.

All Wilderness and *Enhanced Wilderness* would have the same impact on recreation as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would have the same impact on recreation as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action) would provide continued access for ORV travel in Dutch Pasture and Lower Fishhook Canyons. Motorized forms of recreation would be enhanced by this alternative and opportunities for primitive recreation would still be available as described under the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. Existing ORV use would continue under *No Wilderness (No Action)* in Dutch Pasture and Lower Fishhook Canyons. Other primitive recreation uses would continue much the same as in the *Proposed Action* and *Moderate Wilderness*.

DAY MINE

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)*. Big and small game hunting is the primary recreation activity in the WSA but amounts to only about 50 recreation visitor days (RVD) per year. Off-road vehicle use is about 50 RVDs per year, associated mostly with hunting. Vehicle travel is on cherrystem roads and vehicle ways in the northern and northwestern part of the WSA. Under these alternatives, ORV travel and hunting would continue and increase to about 300 RVDs annually at the expense of nonmotorized activities (e.g., hiking and backpacking).

Military overflights would temporarily disrupt recreation activities from the noise produced but the impacts would be short term (lasting about one minute). Construction of livestock waters and maintenance of livestock exclosures would improve wildlife habitat and opportunities for hunting as well as wildlife observation.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would result in continued ORV use of cherrystem roads and vehicle ways in the northern and northwestern part of the WSA. Over the next 10 years, ORV use and hunting would increase from about 100 to 300 RVDs annually at the expense of other nonmotorized activities (e.g., hiking and backpacking).

Military overflights would not impact recreation. Livestock water developments and maintenance of livestock exclosures would improve wildlife habitat and opportunities for hunting and wildlife observation.

All Wilderness would prohibit ORV use of vehicle ways in the northern and northwestern part of the area recommended for wilderness. This would eliminate about 50 RVDs annually but vehicle access for hunting would still be available from the cherrystem and boundary roads or by foot or horseback. *All Wilderness* would enhance opportunities for primitive recreation activities and over the next ten years these wilderness uses would increase to about 500 RVDs per year.

Existing military, livestock and wildlife management activities would have the same impact on recreation as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. *All Wilderness* would eliminate ORV use of vehicle ways in the northern and northwestern portions of the area recommended for wilderness. Use of these ways is low, therefore impacts to ORV recreation would not be significant. Access for hunting would still be available on boundary roads and the three cherrystem roads that penetrate the northern part of the recommended area. *All Wilderness* would enhance primitive recreation opportunities in the WSA and use levels would increase to about 500 RVDs per year over the next ten years.

Enhanced Wilderness would have the same impacts as *All Wilderness* except that the fenceline way in the northwest part of the WSA (an area not recommended for wilderness) would continue to be available for vehicle use. The way beyond Brushy Tank would be closed to vehicle travel as under *All Wilderness*, eliminating about 25 RVDs annually. *Enhanced Wilderness* would result in increased wilderness recreation uses, e.g., hiking, backpacking, photography and nature study. Visitor use levels would increase to about 300 RVDs annually over the next ten years.

CONCLUSION. *Enhanced Wilderness* would differ from *All Wilderness* only in that ORV use of the fenceline way in the northwest part of the WSA would continue (about 25 RVDs annually) and wilderness use levels would increase to 300 RVDs annually over the next ten years.

GILA BOX

Proposed Action and *No Wilderness (No Action)*. Under these alternatives, ORV use in the river canyons would continue (about 1,000 RVDs annually), as would the associated fishing (750 RVDs), picnicking (no estimate) and hunting (150 RVDs). Conflicts with hikers and packpackers would result under these alternatives and the noise of sand buggies (rails) echoing in the canyons would adversely impact solitude. Floatboaters and ORV users are in the canyons at different times of the year so there would be little to no conflicts. Noise from the engines would adversely affect opportunities for solitude, but lasting physical impacts to the environment would not occur. Off-road vehicle travel in the canyon bottoms would damage some vegetation and oil and gas would enter the water on occasion. The impact is not considered significant, however, because use levels are not very high and spring runoff washes away nearly all evidence of the previous year's use.

In the next ten years, ORV use would remain at 1,000 RVDs annually but non-motorized uses would increase to a total of about 2,500 RVDs per year.

Riparian tree planting and livestock management fencing of the river canyons would improve riparian habitat and opportunities for wildlife observation and hunting. Aircraft overflights and noises from the mine at Morenci, Arizona would have short-term, temporary impacts on solitude and recreation opportunities.

CONCLUSION. The *Proposed Action* and *No Wilderness (No Action)* would permit ORV use to continue in the river canyons and would cause conflicts with hikers and backpackers but not floatboaters. While noise from ORVs would disrupt opportunities for solitude, lasting physical impacts to vegetation and water as a result of ORV use would not be significant.

All Wilderness. Fishing and ORV use of the Gila and San Francisco Rivers are the primary activities in the area recommended for wilderness, along with hiking, floatboating and picnicking. *All Wilderness* would prohibit ORV use on the rivers, eliminating an estimated 1,000 visitor days

The rim of the Gila Box in Gila Box WSA provides spectacular views of the Gila River and the surrounding countryside. The elevation range from the river to the upper rims is 1,000 feet.

annually. Picnicking and fishing, if associated with ORV use, would decrease to about 250 RVDs since ORVs would not be permitted. *All Wilderness* would enhance hiking and backpacking because conflicts with ORV use would no longer occur; however, hiking and backpacking use is light (about 100 RVDs annually). In the next ten years, wilderness uses would increase to a total of about 3,500 RVDs per year. Floatboating would be unaffected as it occurs when water levels are too high for other uses. Hunting would be unaffected as most hunting is on the tablelands above the rivers that are accessed by boundary roads. Under this alternative, noise levels and impacts to solitude associated with the ORV use would be eliminated.

The impacts of continued military overflights and wildlife habitat management would be the same as for *Proposed Action* and *No Wilderness (No Action)*.

CONCLUSION. *All Wilderness* would prohibit ORV use of the Gila and San Francisco River canyons, eliminating an estimated 1,000 RVDs annually. Activities associated with ORV travel would also be impacted. This alternative would enhance hiking, backpacking and floatboating opportunities.

Enhanced Wilderness would prohibit ORV use only on the Gila River downstream from its confluence with the San Francisco River, eliminating an estimated 500 RVDs annually. Otherwise, the impacts to recreation would be essentially the same as under *All Wilderness* for lands recommended for wilderness and the same as *Proposed Action* and *No Wilderness (No Action)* for lands not recommended.

CONCLUSION. *Enhanced Wilderness* would have the same impacts as *All Wilderness* but eliminate only 500 RVDs of ORV use annually because this alternative recommends less river mileage for wilderness than *All Wilderness*. The area not recommended for wilderness would be impacted as described under the *Proposed Action* and *No Wilderness (No Action)*.

Moderate Wilderness. Under this alternative environmental impacts would be the same as those under *All Wilderness*, except ORV use would be prohibited on the Gila River downstream from Eagle Creek, eliminating an estimated 500 RVDs annually. Otherwise, the impacts to recreation would be essentially the same as described for *All Wilderness* for the lands recommended for wilderness and the *Proposed Action* and *No Wilderness (No Action)* for the lands not recommended.

CONCLUSION. *Moderate Wilderness* would have the same impacts as *All Wilderness* but eliminate only 500 RVDs of ORV use annually because this alternative recommends less river mileage for wilderness than *All Wilderness*. The area not recommended for wilderness would be impacted as described under the *Proposed Action* and *No Wilderness (No Action)*.

TURTLE MOUNTAIN

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)*. The main recreation uses in Turtle Mountain WSA are hunting (about 75 RVDs annually), ORV use (50 RVDs) and hiking (100 RVDs). Under these alternatives, the low ORV use would continue in Trujillo and South Smith Canyons. Hiking the historic Safford-Morenci Trail would also continue but hikers would be adversely impacted when ORVs were in South Smith Canyon. In the next ten years, total hiking, ORV and hunting use would increase to about 500 RVDs annually.

Other resource uses would have varying impacts on recreation use. Military overflight would have minimal impact on recreation users in the WSA because flights would be temporary and last only one or two minutes. Construction of livestock waters and livestock exclosure fences would improve wildlife habitat and opportunities for hunting and wildlife observation. A request for access to the state inholding in South Smith Canyon could significantly impact recreation uses. If it is determined the only reasonable method of access is by vehicle over a road, hiking along the Safford-Morenci Trail would be adversely impacted because the road would be built up the canyon where the trail is. Access for ORV use and motorized recreation, however, would improve. If a road is not built for access, existing hiking opportunities would be maintained.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would permit ORV use to continue in Trujillo and South Smith Canyons. Hiking the historic Safford-Morenci Trail would also continue but hikers would be impacted by ORVs when they were in the canyon. In the next ten years, total hiking, hunting and ORV use would increase to about 500 RVDs annually. Existing military overflights would have a minimal impact on recreation, while livestock and wildlife management activities would improve hunting and wildlife observation opportunities. Should a request for access to the state inholding result in road construction, further vehicle access would enhance ORV travel and hunting at the expense of primitive recreation, especially hiking on the Safford-Morenci Trail.

All Wilderness would prohibit ORV use in Trujillo and South Smith Canyons but impacts would not be significant because fewer than 50 RVDs occur annually. Most use is by the rancher or hunters. Hiking the historic Safford-Morenci Trail would be enhanced by these alternatives as would primitive recreation throughout the WSA. Access for hunting would be unaffected as most access is by boundary roads, Eagle Creek or cherrystem roads into the WSA. Access to the state inholding has developed as an issue in this WSA and BLM would have to provide reasonable access. Should the request for access result in a road, it would enhance ORV use and access for hunting. However, primitive recreation would suffer, especially hiking along the Safford-Morenci Trail.

CONCLUSION. *All Wilderness* would prohibit ORV use in Trujillo and South Smith Canyons, enhancing opportunities for primitive recreation uses. Recreation use otherwise would differ very little from the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action).*

Enhanced Wilderness would impact recreation the same as described for *All Wilderness* for the part of the WSA recommended for wilderness. In that part of the WSA not recommended, the main use (hunting) would continue.

CONCLUSION. *Enhanced Wilderness* would have essentially the same impact as *All Wilderness.*

JAVELINA PEAK

Proposed Action, Moderate Wilderness and *No Wilderness (No Action).* The primary recreation activity is ORV use of the dunes in the southern part of the WSA but some hunting also occurs. In the winter months ORV use of the dunes is higher than in the summer. Under these alternatives, ORV use would continue. In the next ten years, use would increase 1,000 recreation visitor days (RVDs) to 2,500 RVDs annually. Limited amounts of hunting would also continue with ORV travel providing access to the core of the WSA. Opportunities for primitive recreation would still be available but would be impacted by concurrent ORV use.

Maintenance of existing livestock and wildlife waters would maintain wildlife habitat and improve opportunities for hunting and wildlife observation. Aircraft overflights would have very little impact on solitude because flights are carried out at 1,500 to 51,000 feet above ground level.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would permit existing uses to continue but opportunities for primitive recreation would be impacted by the on-going ORV use. In the next ten years, ORV use would increase from 1,500 to 2,500 RVDs annually. Continued maintenance of livestock and wildlife water would improve opportunities for hunting and wildlife observation.

All Wilderness would prohibit ORV use of the dunes and the lowlands in the western part of the area recommended for wilderness. In the winter months, ORV use in the WSA is approximately 1,000 RVDs, and the total annual use is about 1500. This alternative would not impact the current low levels of hunting as adequate access is provided by boundary roads and a large part of the WSA has relatively gentle terrain, easily crossed by foot or horse. While primitive recreation use is estimated to be quite low, this alternative would preserve continued opportunities for hiking, backpacking, and rock scrambling. Wilderness uses would increase to about 300 RVDs per year over the next ten years. Continued maintenance of livestock and wildlife waters would improve habitat and opportunities for hunting and wildlife observation. Military overflights would have a minimal impact on solitude because overflights are temporary (about one minute in length to cross the recommended area) and of minimal impact due to the high elevation they are flown over the area.

CONCLUSION. *All Wilderness* would prohibit ORV use of the dunes and lowland portions of the WSA and would result in the loss of 1,500 RVDs annually. Wilderness uses such as hiking, backpacking and hunting would increase to about 300 RVDs annually over the next ten years.

Enhanced Wilderness would have the same impacts as *All Wilderness* except that ORV use would continue because the dunes would not be recommended for wilderness under this alternative. In the area recommended for wilderness, opportunities for primitive recreation would be enhanced. In the area not recommended, opportunities for primitive uses, e.g., hiking and backpacking, would be lost to the ongoing ORV use.

CONCLUSION. *Enhanced Wilderness* would provide primitive recreation opportunities in the Whitlock Mountains and continued ORV use in the lowlands and dunes of the WSA.

PELONCILLO MOUNTAINS

Proposed Action, Moderate Wilderness and *No Wilderness (No Action).* Under these alternatives, existing uses would not be affected. Limited ORV, rock collecting and hunting uses would continue. While these alternatives would not emphasize wilderness recreation, opportunities would continue to be available in this remote WSA. In the next ten years, hunting, rockhounding and ORV use would increase 350 RVDs per year to total about 500 RVDs. Construction and maintenance of livestock and wildlife waters would improve wildlife habitat and opportunities for hunting and wildlife observation.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would not affect existing ORV, hunting and rockhounding activities. While these alternatives do not recommend any wilderness, opportunities for primitive recreation would remain available.

All Wilderness. There is very little recreation use in this WSA. The main activity is deer hunting with lesser amounts of ORV use and rock collecting. *All Wilderness* would have little or no impact on hunting or rock collecting because several boundary roads and cherrystem roads provide numerous access points to the roadless portions of the WSA. *All Wilderness* would prohibit ORV use on two vehicle ways branching off the Little Doubtful Canyon cherrystem road but these ways receive little recreational use (about 50 RVDs per year) and impacts would be insignificant. Wilderness management would preserve primitive recreation opportunities, although there is currently little use. Environmental impacts associated with this alternative are insignificant.

Construction and maintenance of livestock and wildlife waters would improve wildlife habitat and opportunities for hunting and wildlife observation.

CONCLUSION. *All Wilderness* would have little impact on existing uses. While this alternative would preclude ORV use on the Little Doubtful Canyon vehicle ways, use is very light (about 50 RVDs per year) and impacts would not be significant. Rock collecting and hunting would continue and opportunities for primitive recreation activities would be enhanced.

Enhanced Wilderness would have the same impact on recreation as *All Wilderness* except that ORV use would be permitted to continue because vehicle ways and use areas would not be in the area designated wilderness. Otherwise, impacts would be the same.

CONCLUSION. *Enhanced Wilderness* would have the same impacts as *All Wilderness* except that ORV use would be permitted to continue because vehicle ways and use areas would not be included in the area recommended for wilderness.

DOS CABEZAS MOUNTAINS

Proposed Action and *Moderate Wilderness*. These alternatives would prohibit ORV use on vehicle ways in Happy Camp and Howell Canyons. This closure would not be a major impact because very little use (fewer than 100 RVDs per year) occurs in these canyons. Associated with ORV use, and potentially impacted, are small amounts of hunting and rock collecting. These alternatives would preserve opportunities for primitive recreation uses such as hiking, backpacking and hunting and in the next ten years, wilderness uses would increase to about 1,000 RVDs per year.

Military overflights would impact wilderness uses, but the impacts would be temporary, lasting about one minute over the area recommended for wilderness. Continued maintenance of livestock and wildlife waters would improve wildlife habitat and opportunities for hunting and wildlife observation.

In the Buckeye Canyon part of the WSA not recommended for wilderness, a mining operation would adversely impact opportunities for recreation. The land needed for mining would be devoted exclusively to that purpose.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would prohibit ORV use in Happy Camp and Howell Canyons, eliminating about 100 RVDs per year. These alternatives, however, would enhance opportunities for primitive recreation such as hiking, backpacking and hunting. In the next ten years, wilderness uses would increase to about 1,000 RVDs annually.

All Wilderness would have the same impacts to recreation as the *Proposed Action* and *Moderate Wilderness* except that the entire WSA would be closed to ORV use, eliminating about 100 RVDs of use annually. Mineral development in Buckeye Canyon would adversely impact opportunities for primitive recreation and solitude.

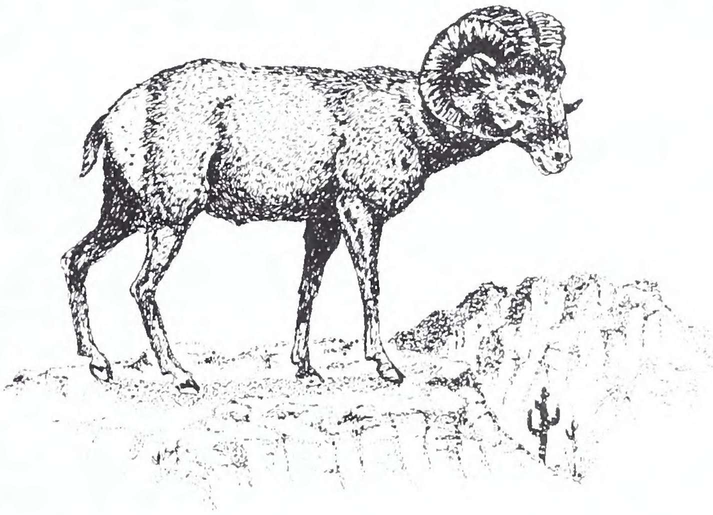
CONCLUSION. *All Wilderness* would have the same impacts as the *Proposed Action* and *Moderate Wilderness*, except that the entire WSA would be closed to ORV use and mining in Buckeye Canyon would adversely impact wilderness recreation opportunities.

Enhanced Wilderness would have the same impacts as the *Proposed Action* and *Moderate Wilderness*, except ORV use would also be prohibited in Sheep and Wood Canyons.

CONCLUSION. *Enhanced Wilderness* would have the same impacts as the *Proposed Action* and *Moderate Wilderness*, except ORV use would also be prohibited in Sheep and Wood Canyons.

No Wilderness (No Action) would allow existing ORV use of the vehicle ways in Happy Camp, Howell, Wood and Sheep Canyons and ORV access for hunting and rock collecting to continue. While this alternative would not emphasize wilderness recreation, these opportunities would remain in most of the WSA. In Buckeye Canyon road construction associated with mining activities would provide further access for motorized forms of recreation but would impact primitive recreation opportunities.

CONCLUSION. *No Wilderness (No Action)* would not impact existing recreation uses. Road construction associated with mineral development would provide further access for motorized recreation but would impact primitive recreation.



IMPACTS ON WILD AND SCENIC RIVERS

Two segments of the Gila River have been identified by the National Park Service as eligible for inclusion in the National Wild and Scenic River System (NWSRS): a 32-mile stretch from Coolidge Dam downstream to the Hayden-Winkelman tailings pond; and a 26-mile stretch centering on the Gila Box. Twelve miles of the first segment forms the southern boundary of the Needle's Eye WSA and 15 miles of the second segment are included in the Gila Box WSA.

The analysis of impacts on wild and scenic rivers includes only the Gila River and the Needle's Eye and Gila Box WSAs.

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would designate 9,201 acres of the WSA as wilderness, preserving all 12 miles of the Gila River in a natural state. Wilderness designation would protect the values that make the river eligible for inclusion in the NWSRS.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would protect the values that make all 12 miles of the Gila River eligible for inclusion in the NWSRS.

All Wilderness and *Enhanced Wilderness* would designate the entire 9,716 acres of Needle's Eye WSA as wilderness. Wilderness management would preserve the values that make all 12 miles of the Gila River in the WSA eligible for inclusion in the NWSRS.

CONCLUSION. *All Wilderness* would protect the values that make all 12 miles of the Gila River in the WSA eligible for inclusion in the NWSRS.

No Wilderness (No Action) would not designate any of the WSA as wilderness but wild and scenic river values would not be impacted. There are no land uses planned that would degrade the values that make the river eligible for inclusion in the NWSRS. In fact, livestock exclosure and management fences planned for the Gila River would improve its riparian vegetation community and its NWSR values.

CONCLUSION. This alternative would not protect the Gila River through wilderness designation but there are no land use activities planned that would adversely impact the river values that make this segment eligible for inclusion in the NWSRS. Exclosure fences would be constructed, improving riparian vegetation and river values.

GILA BOX

Proposed Action and *No Wilderness (No Action)* would not designate any of Gila Box WSA as wilderness but the values of the Gila River that made it eligible for inclusion in the NWSRS would not be significantly impacted. Under these alternatives, ORVs would continue using the canyon bottom but impacts on the physical environment are minimal. Although noise from ORVs would disrupt visitors' solitude, these impacts are temporary and seasonal (when water levels are low enough to drive up the river). Impacts to vegetation would be minimal because ORVs drive on existing trails through the mesquite bosques and on the sandy/cobbly river bottom where little vegetation grows. Impacts to water quality resulting from fuel or oil spills would also be minimal because, at the current levels of use, mishaps of this nature would not significantly degrade water quality. The evidence of most ORV use is washed away each year during spring runoff.

Under these alternatives, the river canyon is to be fenced to manage livestock use in the river bottom and riparian trees are being planted to re-establish the stands of trees that once existed along the river. These actions would result in improved streamside vegetation, bank stability, water quality, wildlife habitat and scenic views, all of which would improve the river values that make the Gila River eligible for the NWSRS.

CONCLUSION. These alternatives would not protect wild and scenic river values through wilderness management but existing land uses would not significantly impact the eligibility of river segment for inclusion in the NWSRS.

All Wilderness would designate the entire 17,831 acres of the WSA as wilderness. Wilderness management would preserve the values that make the 15 mile stretch of the Gila River in the WSA eligible for inclusion in the NWSRS. The ongoing ORV use would be prohibited, eliminating the impacts of ORV use on solitude. The exclosure fence and tree planting projects underway to re-establish riparian vegetation along the river would improve the values that make the river segment eligible for inclusion in the NWSRS.

CONCLUSION. *All Wilderness* would preserve and improve the values that make this segment of the Gila River eligible for inclusion in the NWSRS.

Enhanced Wilderness would designate 15,272 acres of the WSA as wilderness, protecting 11 miles of the Gila River through wilderness management. Impacts to wild and scenic river values in the area recommended for wilderness would be the same as *All Wilderness*, no adverse impacts. In the area not recommended, impacts on river values would be the same as the *Proposed Action* and *No Wilderness (No Action)*, no significant impacts.

CONCLUSION. *Enhanced Wilderness* would have no significant impact on the river values that make the Gila River in the WSA eligible for inclusion in the NWSRS.

Moderate Wilderness would designate 10,192 acres of the WSA as wilderness, protecting eight miles of the Gila River through wilderness management. Impacts to the wild and scenic river values would be the same as for *All Wilderness*. In the area not recommended, impacts on river values would be the same as under the *Proposed Action* and *No Wilderness (No Action)*, no significant impacts.

CONCLUSION. *Moderate Wilderness* would protect eight miles of the Gila River through wilderness management. Impacts to wild and scenic river values would be the same as described for *All Wilderness*.

IMPACTS ON LAND USE

Access to state and private land is a significant land use action affected by wilderness designation. BLM policy provides for adequate access to state or private inholdings. Adequate access is defined as the combination of routes and modes of travel having the least lasting impact on wilderness values while serving the reasonable purposes for which the state or private land is held. Controlling access to something less than vehicle travel on a road could adversely impact landowners. Likewise, granting access across a WSA to an inholding could adversely impact wilderness values. There are no significant land use actions that would be affected by the *Proposed Action* or any alternative in Fishhooks, Day Mine, Gila Box, Javelina Peak, Peloncillo Mountains or Dos Cabezas Mountains WSAs (see Chapter 2 discussion of anticipated land use actions by WSA and alternative). These WSAs will not be discussed further in this section of Chapter 4.

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness*. Under these alternatives, the 44 kv powerline crossing the area recommended for wilderness would be unaffected by wilderness management. The current method of access and powerline maintenance (by foot, horse and helicopter) would continue. Upgrading the powerline to 69 kv in the next 10 years would be unaffected by wilderness management because the powerline would be a valid right, existing as of the date of designation.

These alternatives would preclude use of three withdrawals established for dam construction and hydroelectric power. These dams and reservoirs would not be permitted in wilderness unless approved by the President. Although the withdrawals are active, the dams would not be built. A fourth withdrawal is for protection of the Gila River watershed. These alternatives would give additional protection to the watershed.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would not significantly impact maintenance or upgrading of the 44 kv powerline that crosses the WSA. Three withdrawals for dam construction on the Gila River are active, but the dams would not be built. A fourth withdrawal for watershed protection would be enhanced by wilderness management.

All Wilderness and *Enhanced Wilderness* would have the same effect on the powerline and withdrawals as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. The impacts of these alternatives on land uses would be the same as under the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action) would have no impact on the existing powerline, dam withdrawals or watershed protection withdrawal. Operation of the powerline would continue unaffected by wilderness management. While the dams would not be built under this alternative, protection of the Gila River watershed would continue under the existing land use withdrawal.

CONCLUSION. *No Wilderness (No Action)* would have no impact on existing land uses.

BLACK ROCK

Proposed Action and *Moderate Wilderness*. The area recommended for wilderness under these alternatives is accessible primarily by the Black Rock Road which crosses a small part of the San Carlos Apache Indian Reservation. Tribal policy is to restrict reservation access and travel of nontribal members. The Tribe has expressed concern that wilderness designation would result in significant increases in visitors crossing the Reservation to reach the wilderness and thus increased vandalism, trespass and theft of natural resources. Significant problems with recreationists could lead to closure of the road and access to the wilderness. The Department of Interior Field Solicitor has studied the case and it is his opinion the Tribe cannot close this road. It is a public road and available for public use because public funds have been expended on its maintenance.

Under these alternatives, the Tribe and adjacent private property owner would continue to have visitor-related problems such as trespassing and vandalism. Access to the area recommended for wilderness by the Black Rock Road, however, would not be closed.

CONCLUSION. The San Carlos Apache Tribe, and adjacent private property owners would continue to have visitor-related problems but access to the area recommended for wilderness would continue on the Black Rock Road.

All Wilderness would have the same impact on visitor-related problems and access to the area recommended for wilderness as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *All Wilderness* would have the same impact on visitor-related problems and access as the *Proposed Action* and *Moderate Wilderness*.

Enhanced Wilderness would have the same impact on visitor-related problems and access to the area recommended wilderness as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on visitor-related problems and access as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action). Under this alternative, recreation use of the Black Rock area would continue and access across the Reservation would still lead to visitor management problems. Access to the area, however, would remain open.

CONCLUSION. *No Wilderness (No Action)* would still lead to visitor-related problems because the public would continue to use the Black Rock area for recreation. Access to the area, however, would remain open.

TURTLE MOUNTAIN

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)* would not impact access to the state inholding in South Smith Canyon. If road access for livestock management purposes were granted, the livestock operation would be better served, but other resources in the vicinity would receive significant impacts.

CONCLUSION. The *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* would not impact a request for access to the state inholding in South Smith Canyon.

All Wilderness could adversely impact a request for access to the State inholding in South Smith Canyon. It is difficult to project the impact without knowing the specific need for the access request. The request for access would probably be for livestock purposes and, according to BLM policy, reasonable access must be provided to accomplish the intended use of the inholding. If the rancher requested road access but was granted only foot or horse access across public lands, the impact would be adverse. If, however, road access were granted, adverse impacts on historical values and primitive recreation uses would result.

CONCLUSION. *All Wilderness* would provide a reasonable method of access to the state inholding.

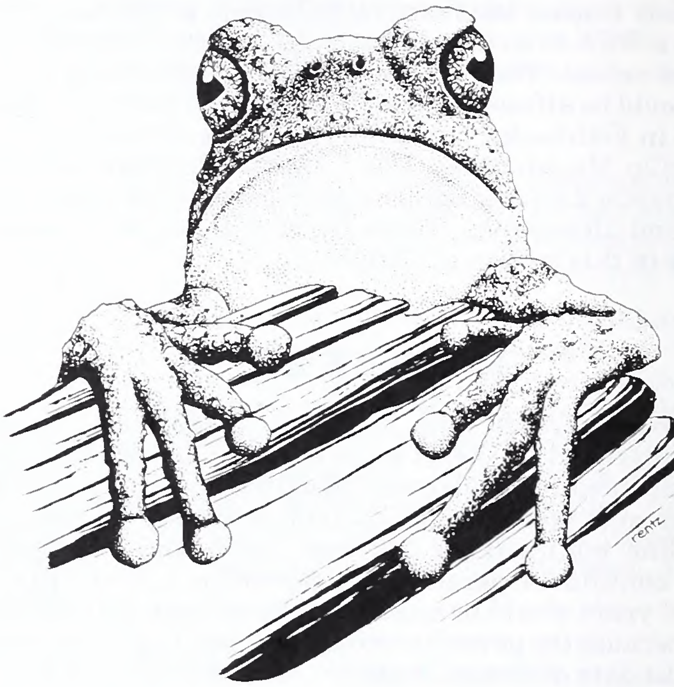
Enhanced Wilderness would have the same impact on access to the state inholding in South Smith Canyon as *All Wilderness*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on access to the state inholding as *All Wilderness*.

IMPACTS ON WILDLIFE

Wilderness designation would generally benefit wildlife and wildlife habitat. Habitat disturbance associated with mining and road construction would be decreased or eliminated altogether, benefitting wildlife populations and their habitat. Wilderness management would not constrain most habitat projects if they were properly designed to reduce or eliminate impacts on the wilderness resource. Projects such as spring developments, catchments, exclosures and riparian vegetation rehabilitation would be implemented and would improve wildlife habitat.

The following is a discussion of impacts on wildlife species and their habitat by WSA and alternative. Of special interest in the WSAs is riparian vegetation because of its importance to wildlife. This section will discuss not only impacts on wildlife but on riparian vegetation because of its importance as wildlife habitat. An analysis of impacts specific to riparian vegetation is found in the Impacts of Vegetation section of this chapter.



NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would cause no significant impacts on wildlife and habitat would improve.

Other existing resource uses would have temporary, minimal impacts on wildlife. Military aircraft overflights and helicopter maintenance flights along the powerline crossing the WSA would disrupt wildlife particularly bighorn sheep and birds of prey such as hawks, eagles, falcons and owls. The impact, however, would not be significant because the noise produced by the aircraft would be temporary (lasting about one minute) and infrequent (about once per day). Off-road vehicle use of the way in the eastern part of the WSA not recommended for wilderness would disturb wildlife but the impact would not be significant because the amount of use is low and the impacts are temporary.

To reestablish stands of riparian vegetation that once existed, two exclosures would be built on the Gila River and planted with cottonwoods and willows. The existing exclosures on Mescal Creek would be maintained to preserve and expand riparian vegetation.

CONCLUSION. There would be no significant impacts on wildlife under the *Proposed Action* and *Moderate Wilderness*. Continued military and utility flights over the area recommended for wilderness would disturb wildlife but impacts would be minimal and temporary. Off-road vehicle use would also disrupt wildlife but impacts would not be significant because ORV use levels are very low and the effects are temporary. Wildlife habitat would improve from construction and maintenance of exclosure fences and planting of cottonwood and willow trees.

All Wilderness and *Enhanced Wilderness* would have the same impact as the *Proposed Action* and *Moderate*

Wilderness except that ORV use of the vehicle way in the eastern part of the area recommended for wilderness would be prohibited. This would eliminate the minimal impact on wildlife associated with ORV activity.

CONCLUSION. All Wilderness and Enhanced Wilderness would have the same impact on wildlife as the Proposed Action and Moderate Wilderness.

No Wilderness (No Action) would have the same impacts as the *Proposed Action* and *Moderate Wilderness* alternatives except that a road to Dick Spring would be built from the vehicle way in the eastern part of the WSA. Road construction and use of the new road would disturb wildlife during construction and periods of use. With a road to access previously unroaded public lands, increased vehicle use would cause adverse impacts on wildlife.

CONCLUSION. *No Wilderness (No Action)* would have the same impacts on wildlife as the *Proposed Action* and *Moderate Wilderness*. In addition, road construction to Dick Spring would result in increased disturbance of wildlife.

BLACK ROCK

Proposed Action and *Moderate Wilderness* would benefit wildlife in the area recommended for wilderness. Construction of individual exclosure fences around cottonwood and willow trees in Black Rock Creek would protect these trees until they grow large enough to resist damage from wildlife and cattle. The result would be the expansion of important habitat for wildlife. Existing uses in the recommended area would have no adverse impact on wildlife or their habitat.

In the area not recommended for wilderness, construction of two livestock waters would provide an additional permanent water source for wildlife in an area where natural water is only seasonal. North of Jackson Mountain, development of a mine would remove ten acres of vegetation and disturb wildlife during mining development and operations. Disturbance to wildlife would vary with species but impacts would range from temporary disturbance to permanent displacement.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would benefit wildlife and riparian habitat through construction of exclosure fences around cottonwood and willow trees in Black Rock Creek. In the area not recommended for wilderness, construction of a livestock water would provide permanent water for wildlife where natural water is only seasonal, but development of a mine north of Jackson Mountain would disrupt wildlife and ten acres of their habitat.

All Wilderness would have the same impacts on wildlife as the *Proposed Action* and *Moderate Wilderness* except that the benefits of the livestock water and the disruption caused by mining would also occur in the area recommended for wilderness.

CONCLUSION. *All Wilderness* would impact wildlife the same as the *Proposed Action* and *Moderate Wilderness* except that the livestock water development and mining operation would also occur in the area recommended for wilderness.

Enhanced Wilderness would have the same impacts on wildlife as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on wildlife as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action). Under this alternative, the exclosure fences and livestock waters would be built and the mine would be developed, so impacts on wildlife would be the same as under the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. Impacts to wildlife would be the same as described for the *Proposed Action* and *Moderate Wilderness*.

FISHHOOKS

Proposed Action and *Moderate Wilderness* would benefit wildlife and their habitat by continuing maintenance for six Lower Fishhook Canyon exclosure fences which would enhance and expand the riparian vegetation that is so vital to wildlife in the desert Southwest. Three yearlong springs developed to provide water for livestock would also benefit wildlife.

Other existing resource uses under this alternative would not significantly impact wildlife. The Air Force trains at low levels (500 to 1,500 feet above the ground) in the airspace over the area recommended for wilderness. The noise of jet aircraft would disrupt wildlife but, because the noise is temporary and flights only occur about once per day, impacts on wildlife would not be significant.

In the area not recommended for wilderness ORVs would continue to drive the cherrystem road in the eastern part of the WSA but use levels are low and the noise that disrupts wildlife would, therefore be limited and temporary. Livestock use would increase 53 AUMs (about four cows per year) because improved range (forage) condition can support additional cattle use. This increased use would not impact wildlife or the vegetation condition.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would benefit wildlife through maintenance of existing livestock exclosures and the development of three springs for livestock. Continued Air Force overflights would have short-term, temporary impacts on wildlife and in the area not recommended for wilderness, continued ORV and livestock uses would not significantly impact wildlife.

All Wilderness and *Enhanced Wilderness* would have the same impacts on wildlife as the *Proposed Action* and *Moderate Wilderness*. The only difference is that the increased livestock use would occur in the area recommended for wilderness. There would be no impacts on wildlife, however, because improved range condition can support additional livestock use.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would have the same impact on wildlife as the *Proposed Action* and *Enhanced Wilderness.*

No Wilderness (No Action). Under this alternative, military aircraft would continue to overfly the WSA, three livestock waters would be developed, livestock use would increase 53 AUMs and exclosure fences would be maintained in Lower Fishhook Canyon. The impact of these actions on wildlife would be the same as the *Proposed Action* and *Moderate Wilderness.* In addition to these actions, ORV use would continue on vehicle ways in Dutch Pasture and Lower Fishhook Canyons. Disturbance of wildlife would occur when vehicles were in the canyons but impacts would not be significant because ORVs do not use these canyons very often and the noise is only temporary.

CONCLUSION. There would be no significant impact on wildlife even with ORV use of Lower Fishhook and Dutch Pasture Canyons.

DAY MINE

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would improve wildlife and their habitat. On the eastern boundary of the WSA in the Left Fork of Markham Creek, the maintenance of five exclosure fences would enhance and expand riparian vegetation, critical habitat for wildlife. In order to provide reliable water for livestock, five yearlong water sources would be developed for livestock—which would also benefit wildlife in parts of the WSA where natural water is only seasonal.

Other resource uses would continue with insignificant impacts on wildlife. Military aircraft would continue to train over the WSA at low levels. These flights would disrupt wildlife but impacts would be short-term, lasting less than one minute over the WSA, and only occurring about once per day. Off-road vehicles would continue to drive the cherrystem roads and vehicle ways in the northern part of the WSA, but because use levels are so low each year, and not expected to increase significantly in the coming years, disruption and displacement of wildlife would be minimal.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would benefit wildlife and their habitat through planned wildlife and livestock management activities. Continued military and ORV uses would not significantly impact wildlife.

All Wilderness would have the same impacts on wildlife as described for the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would not be permitted, eliminating the minimal disruption to wildlife caused by ORV travel over existing roads and ways.

CONCLUSION. *All Wilderness* would impact wildlife the same as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would not occur, eliminating the minimal impact on wildlife.

Enhanced Wilderness would have the same impacts on wildlife as *All Wilderness* except that ORV use would continue on cherrystem roads and the fenceline vehicle way in the northwest part of the WSA not recommended for wilderness. This would result in a minimal amount of disturbance and displacement of wildlife from vehicle noise and human presence because ORV use of this way is quite low (about 25 RVDs per year) and the presence of vehicles and people is temporary.

CONCLUSION. Impacts to wildlife are essentially the same under *Enhanced Wilderness* as *All Wilderness.* The difference is a small amount of ORV use (about 25 RVDs per year) in the northwest part of the WSA not recommended for wilderness. Off-road vehicle use would temporarily disrupt and displace wildlife.

GILA BOX

Proposed Action and *No Wilderness (No Action)* would cause both beneficial and adverse impacts on wildlife and their habitat. In an effort to reestablish broadleaf riparian vegetation along the Gila and San Francisco Rivers, the river canyons are being fenced to manage cattle use in the canyons and cottonwood and willow trees are being planted. The enhancement and expansion of riparian vegetation along the rivers would provide outstanding habitat, benefitting wildlife species. Release of the woundfin minnow and bighorn sheep in the WSA would help in the expansion of threatened and endangered wildlife, resulting in the establishment of stable populations.

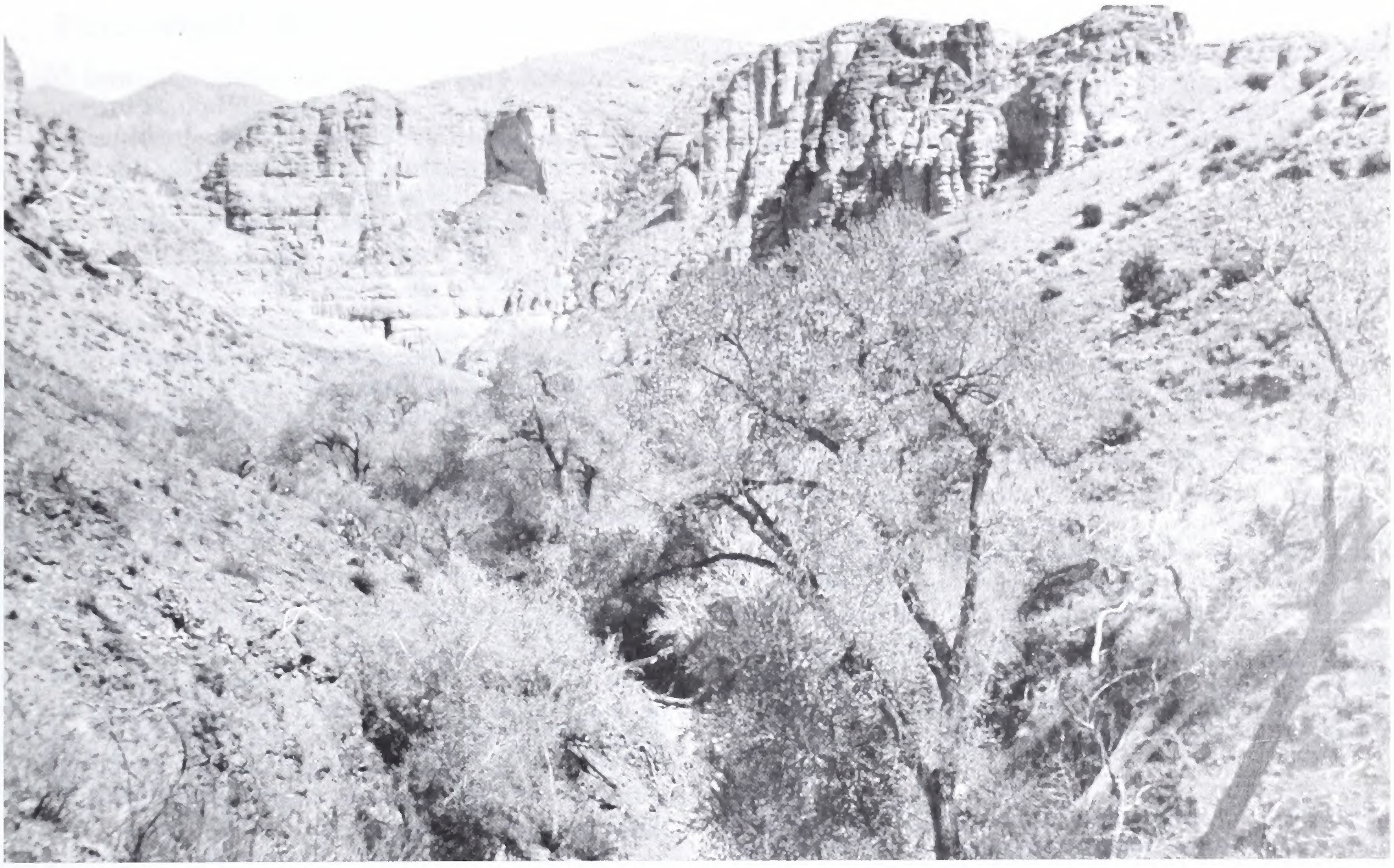
Under these alternatives, ORVs would continue to travel through the river canyons with the noise disrupting or displacing wildlife. The impacts are low because the noise is temporary.

CONCLUSION. Under these alternatives, reestablishment of riparian vegetation would enhance wildlife. Introduction of threatened and endangered wildlife would help expand their range and result in stable populations. Continued noise from ORV use in the river canyons would have a low impact on wildlife.

All Wilderness would benefit wildlife with impacts the same as the *Proposed Action* and *No Wilderness (No Action)*, except that under this alternative, ORV use of the river canyons would be prohibited. With the exclusion of ORV traffic, impacts on wildlife created by the noise would be eliminated.

CONCLUSION. *All Wilderness* would have the same impact on wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that ORVs would not be allowed in the river canyons. The exclusion of ORVs would eliminate the disruption of wildlife caused by engine noise.

Enhanced Wilderness would have the same impact on wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that under this alternative, ORV use on the Gila River downstream from its confluence with the San Francisco River would be prohibited. With the exclusion of



The cliffs and rock outcrops of Hot Springs Canyon are typical of the canyons of Turtle Mountain WSA that drain eastward to Eagle Creek.

ORVs, impacts on wildlife created by the noise would be eliminated. Upstream of the confluence, ORV use would continue with impacts the same as described under the *Proposed Action* and *No Wilderness (No Action)*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that ORVs would be prohibited on the Gila River downstream from its confluence with the San Francisco River, eliminating the disruption of wildlife caused by engine noise. Upstream of the confluence, ORV use would continue with impacts the same as described for the *Proposed Action* and *No Wilderness (No Action)*.

Moderate Wilderness would have the same impacts on wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that, under this alternative, ORV use on the Gila would not be allowed from Eagle Creek downstream to the boundary of the area recommended for wilderness. With the exclusion of ORVs, the noise impacts on wildlife would be eliminated. Upstream of Eagle Creek, on the Gila and San Francisco, ORV use would continue to temporarily disrupt wildlife.

CONCLUSION. *Moderate Wilderness* would have the same impact on wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that ORVs would be prohibited on the Gila River downstream from Eagle Creek, eliminating the disruption of wildlife caused by engine noise. Upstream from Eagle Creek, ORV use would continue on both the Gila and San Francisco Rivers with the same impacts as described for the *Proposed Action* and *No Wilderness (No Action)*.

TURTLE MOUNTAIN

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)*. Under these alternatives, wildlife and their habitat would generally improve. There could be, however, some adverse impacts on wildlife. Since none of the WSA would be recommended for wilderness under these alternatives, several range facilities would be built in the WSA in implement grazing systems on two allotments. Eight miles of pipeline, three storage tanks, seven troughs, and two spring developments would be built to support cattle in previously underutilized parts of the WSA. The result would be increased competition between cattle and wildlife but also increased sources of waters for wildlife. Overall, wildlife would benefit with additional sources of water.

To further enhance and expand wildlife habitat, a spring would be developed in Hot Springs Canyon and an exclosure fence built around the spring development. This would result in additional habitat (cover, water and food) for the benefit of wildlife in the WSA. Livestock exclosures in South Smith Canyon would also be rebuilt, preserving and enhancing riparian habitat.

A request for access to the state inholding could have adverse impacts on wildlife because BLM is required to provide reasonable access to inholdings. If a road were built, wildlife would be disrupted and displaced from South Smith Canyon during construction and while vehicles traveled on the road. The impacts would not be significant because they would be temporary, occurring only when vehicles used the road and use of the road would not be heavy.

CONCLUSION. Overall, wildlife would benefit under the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*. Construction of livestock waters, a wildlife water and exclosures would provide additional habitat for wildlife. If road access were granted to the state inholding, wildlife would be temporarily impacted by the noise of road construction and vehicles using the road.

All Wilderness would cause no significant impact on wildlife but could have adverse impacts on wildlife. If it is determined that the only reasonable access to the state inholding in South Smith Canyon is by vehicle over a road, wildlife would be disrupted during road construction and use of the road by vehicles. The impact would not be significant because the noise of construction would only be temporary and use of the road would not be heavy.

CONCLUSION. *All Wilderness* would have no significant impact on wildlife, but a request for access to the state inholding could result in temporary disruption of wildlife in South Smith Canyon.

Enhanced Wilderness would improve wildlife and their habitat. In the area recommended for wilderness, impacts on wildlife would be the same as *All Wilderness*. A temporary disruption of wildlife could occur from road construction to the state inholding in South Smith Canyon. In the southern part of the WSA not recommended for wilderness, four miles of pipeline, a storage tank and three troughs would be built to implement a grazing system. These waters would introduce cattle to underutilized parts of the WSA and result in some competition between cattle and wildlife for food. Additional yearlong waters would, however, greatly improve wildlife habitat.

CONCLUSION. *Enhanced Wilderness* would improve wildlife and their habitat in that part of the WSA not recommended for wilderness. Under this alternative, additional livestock waters would be built in areas that now have only seasonal waters. As a result, wildlife and their habitat would improve. In that part of the WSA recommended for wilderness, road access to the state inholding could temporarily disrupt wildlife in South Smith Canyon.

JAVELINA PEAK

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)* would have both beneficial and adverse impacts on wildlife. ORV use would continue on the dunes in the southern part of the WSA and, over the next 10 years, would increase 1,000 RVDs to 2,500 RVDs per year. Low to moderate impacts on wildlife would result from engine noise. The noise would disrupt or displace wildlife when ORVs were using the dunes, but the impact would be temporary.

Continued maintenance of livestock and wildlife water developments would preserve habitat for wildlife in the WSA. The result would be the enhancement of wildlife populations.

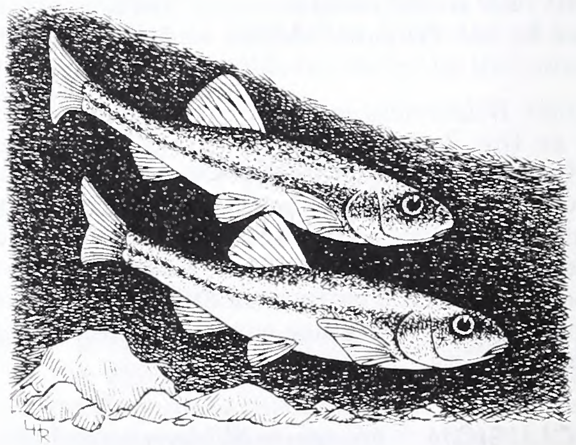
CONCLUSION. Continued ORV use of the dunes would have a low to moderate impact on wildlife. Maintenance of livestock and wildlife water developments would preserve a vital component of wildlife habitat, benefitting wildlife.

All Wilderness would have the same impact on wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use would not be allowed in the dunes because this area would be recommended for wilderness. As a result, the impact of ORVs on wildlife would not occur.

CONCLUSION. *All Wilderness* would have the same impact on wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except that ORVs would not be allowed on the dunes in the southern part of the area recommended for wilderness, eliminating the disruption of wildlife caused by engine noise.

Enhanced Wilderness would have the same impact on wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*. Livestock and wildlife waters would be maintained preserving habitat and ORV use would continue on the dunes with low to moderate impacts on wildlife.

CONCLUSION. *Enhanced Wilderness* would have the same impact on wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.



PELONCILLO MOUNTAINS

Proposed Action, Moderate Wilderness and *No Wilderness (No Action)* would benefit wildlife and their habitat. Construction of two livestock waters and maintenance of existing livestock and wildlife water developments would expand wildlife habitat and enhance populations in the WSA. Release of desert bighorn sheep in the WSA would help in the expansion of their range.

CONCLUSION. The *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)* would benefit wildlife by construction and maintenance of water developments and release of desert bighorn sheep to expand the population

All Wilderness would have the same impact on wildlife as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action).*

CONCLUSION. *All Wilderness* would have the same impact on wildlife as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action).*

Enhanced Wilderness would have the same impact on wildlife as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action).*

CONCLUSION. *Enhanced Wilderness* would have the same impact as the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action).*

DOS CABEZAS MOUNTAINS

Proposed Action and *Moderate Wilderness.* In the area recommended for wilderness, there would be no significant impact on wildlife. Maintenance of existing livestock and wildlife water developments would continue to provide yearlong water in areas where only seasonal water previously existed, improving wildlife habitat and benefitting wildlife. Under these alternatives, ORV use would not be allowed in Happy Camp and Howell Canyons. The exclusion of ORVs would result in less disturbance of wildlife but the benefits to wildlife would not be significant because ORV use levels in these canyons are low (fewer than 100 RVDs per year). Military aircraft training over the area recommended for wilderness at low altitude (500 to 1,500 feet above the ground) would disturb wildlife, but because the flights only last about one minute, the disturbance would not be significant.

In Buckeye Canyon (not recommended for wilderness) a mine development (road construction and mining operations) would disturb 115 acres. Wildlife habitat on this acreage would be eliminated during the life of the mine and wildlife would be displaced. When the mining operation ends, reclamation of disturbed ground would restore some of the wildlife habitat and wildlife would reoccupy the area.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would have no significant impact on wildlife in the area recommended for wilderness. Exclusion of ORVs and maintenance of livestock and wildlife water developments would benefit wildlife and habitat but low-level military overflights would temporarily impact wildlife. In the area not recommended for wilderness a mining operation would eliminate 115 acres of habitat and displace wildlife during the life of the mine.

All Wilderness would have the same impact as the *Proposed Action* and *Moderate Wilderness* except that mining in Buckeye Canyon would be in the area recommended for wilderness. A valid discovery, and therefore a valid existing right, would allow development of the mine. Under *All Wilderness*, ORV use would not be permitted in Wood and Sheep Canyons, eliminating disturbance to wildlife.

CONCLUSION. *All Wilderness* would have the same impact on wildlife as the *Proposed Action* and *Moderate Wilderness* except that impacts on wildlife caused by mining in Buckeye Canyon would occur in the area recommended for wilderness but impacts caused by ORV use in Wood and Sheep Canyons would not occur.

Enhanced Wilderness would have the same impact on wildlife as the *Proposed Action* and *Moderate Wilderness.* In addition, ORV use would not be permitted in Sheep and Wood Canyons, eliminating disturbance to wildlife.

CONCLUSION. *Enhanced Wilderness* would have essentially the same impact on wildlife as the *Proposed Action* and *Moderate Wilderness.*

No Wilderness (No Action) would have minimal impact on wildlife in most of the WSA. Low-level military overflights and ORV use in Happy Camp, Howell, Sheep and Wood Canyons would disturb wildlife but impacts would not be significant because use levels are low and the noise is temporary. Maintenance of livestock and wildlife water developments would provide yearlong water where previously natural water was only seasonal. The result would be improved habitat and wildlife populations. In Buckeye Canyon, development of a mine would eliminate habitat on 115 acres and displace wildlife for the life of the mining operation.

CONCLUSION. *No Wilderness (No Action)* would have no significant impact on wildlife in the WSA except in Buckeye Canyon. In Buckeye Canyon development of a mine would eliminate 115 acres of habitat and displace wildlife for the life of the mine.

IMPACTS ON THREATENED AND ENDANGERED WILDLIFE

Federal- and state-protected species would generally benefit from wilderness management. Designation would provide an added measure of protection to 16 species found (or probably found) in all of the WSAs (see Table 3-9). Wilderness would restrict or prohibit surface disturbances that would impact species or their habitat. Even under the *No Wilderness (No Action)* alternative, protected species would not be significantly impacted because BLM policy and the Endangered Species Act provide for their protection. Adverse impacts would be identified and mitigated through project specific environmental assessments.

The following is a discussion of impacts on threatened and endangered (T&E) wildlife by WSA and alternative.

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would benefit T&E wildlife and populations would increase. To improve the distribution of T&E species in their historic range, BLM, in cooperation with the AGFD introduced Gila topminnow into ponds at Mescal Warm Springs. Desert pupfish, loach minnow, spike dace and Gila chub would also be introduced into Mescal Creek and adjoining springs. Two exclosures built on the Gila River to preserve riparian habitat and native trees enhance the existing habitat. In Mescal Creek, existing exclosures would be maintained and additional sites would be planted and fenced to preserve riparian habitat in this part of the WSA recommended for wilderness. Improved habitat would enhance T&E wildlife populations.

Existing uses would not significantly impact T&E species. Noise created by low-level military training flights, helicopter maintenance of the powerline crossing the WSA and ORV use of the vehicle way in the eastern part of the WSA (the area not recommended for wilderness), would disrupt T&E birds and desert bighorn sheep but impacts would not be significant. The overflights are temporary, lasting about one minute. Off-road vehicle use is low (about 50 RVDs annually) and the noise and impact eases as vehicles travel by. Helicopter inspections have a little more impact. Flights last up to 30 minutes but maintenance flights are only made every 90 days.

Livestock use would increase in the Mescal Mountain Allotment by 191 AUMs in the next 10 years. The range is in good shape and this increase would not significantly impact range condition or bighorn sheep.

CONCLUSION. Threatened and endangered species would be enhanced under these alternatives due to reintroduction of native fish and maintenance and improvement of riparian habitat. Other existing uses would not significantly impact T&E birds or bighorn sheep.

All Wilderness and *Enhanced Wilderness* would have the same impact on T&E species as the *Proposed Action* and *Moderate Wilderness* except that the ORV use would not be permitted, eliminating this impact.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would have the same impact on T&E species as the *Proposed Action* and *Moderate Wilderness* except that the ORV use would not be permitted, eliminating this impact.

No Wilderness (No Action) would result in additional impact on T&E wildlife. Under this alternative, impacts would be the same as described for the *Proposed Action* and *Moderate Wilderness* but, in addition, construction of a 2½ mile ranch road would disrupt T&E wildlife during construction and use of the road. A previously unroaded part of the WSA would receive more vehicle travel and people. The result would be additional pressures to T&E species.

CONCLUSION. No wilderness (No Action) would have the same impact as the *Proposed Action* and *Moderate Wilderness*. Road construction, however, would create additional adverse impacts on T&E wildlife.

BLACK ROCK

Proposed Action and *Moderate Wilderness.* In the area recommended for wilderness, existing resource uses would not affect T&E species. In the eastern part of the WSA (that area not recommended for wilderness), development of a mine and increased livestock use would impact bighorn sheep. North of Jackson Mountain, a mine would disturb 10 acres of habitat and disrupt bighorn sheep during the life of the mine. Reclamation would help restore the habitat. Development of a two livestock waters and stock trail would have both positive and negative impacts on the sheep. Development of the water would provide a dependable yearlong water but increased cattle use in this area would result in competition with bighorn sheep.

CONCLUSION. In the area recommended for wilderness, existing resource uses would not affect T&E species. In the area not recommended for wilderness, development of a mine would adversely impact desert bighorn sheep. Livestock proposals would both benefit and impact bighorn sheep.

Several canyons radiate from the summit of Jackson Mountain in Black Rock WSA.

All Wilderness would have the same impact on bighorn sheep as the *Proposed Action* and *Moderate Wilderness* except that the mining operation and planned livestock facilities would be in the area recommended for wilderness.

CONCLUSION. *All Wilderness* would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness* except that all resource uses would be in the area recommended for wilderness.

Enhanced Wilderness would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness.*

CONCLUSION. *Enhanced Wilderness* would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness.*

No Wilderness (No Action) would cause the same impacts on T&E wildlife as the *Proposed Action* and *Moderate Wilderness.* In addition, ORV use of the vehicle way in Fourmile Canyon would disrupt bighorn sheep and peregrine falcons. The impact would not be significant, however, because use levels are very low (about 50 RVDs annually) and the impact is only temporary, occurring only when vehicles are present.

CONCLUSION. *No Wilderness (No Action)* would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness.* Also, ORV use on the Fourmile Canyon way would temporarily disrupt both desert bighorn sheep and peregrine falcons.

FISHHOOKS

Proposed Action and *Moderate Wilderness* would benefit T&E wildlife. Maintenance of six livestock exclosures in Lower Fishhook Canyon would improve riparian habitat and benefit the black hawks inhabiting the area recommended for wilderness.

Existing resource uses would have some impact on these species but impacts would not be significant. Low-level, military overflights would disrupt the black hawks and bald eagles but the flights are temporary, lasting about one minute. Construction of three livestock waters and one mile of fence would disrupt the nearby T&E species while work was going on. The projects are quite small, however, and disturbance due to construction would not be significant. Under these alternatives, ORV use in Dutch Pasture and Lower Fishhook Canyons would be prohibited. The noise created by this small amount (about 50 RVDs) of use would be eliminated, benefitting both the black hawk and bald eagle.

In the area not recommended for wilderness, continued ORV use of the cherrystemmed road would impact T&E species. Impacts would be insignificant, however, because use levels are low and the impact is temporary, occurring only when vehicles use the road.

CONCLUSION. These alternatives would benefit T&E wildlife. Maintenance of livestock exclosures would improve habitat for black hawks. Existing military and livestock uses would not significantly impact T&E wildlife. In the area not recommended for wilderness, ORV use of the cherrystemmed road would, during use, temporarily impact T&E species.

All Wilderness and *Enhanced Wilderness* would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness*, except no ORV use would be permitted, eliminating this impact on the species.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would have essentially the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness.*

No Wilderness (No Action) would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness* except that ORV use would continue in Dutch Pasture and Lower Fishhook Canyons. Impacts to black hawks and bald eagles would not be significant because ORV use levels are low (about 50 RVDs annually) and the noise that disrupts these species is temporary.

CONCLUSION. *No Wilderness (No Action)* would have the same impact on T&E species as the *Proposed Action* and *Moderate Wilderness* except ORV use would continue. Impacts from noise created by ORVs would not be significant because use levels are low and the noise temporary.

DAY MINE

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)* would benefit T&E wildlife. Maintenance of five exclosures in the Left Fork of Markham Creek would preserve riparian habitat, important for the T&E birds inhabiting the WSA.

Existing resource uses would not significantly impact T&E species. Low-level, military training flights do disturb the bald eagles, black hawks and northern beardless tyrannulets, but the impacts would not be significant because the noise is temporary (lasting about one minute). Construction of livestock facilities would disrupt T&E species in the immediate area of the project site, but, because the facilities are small and construction time short, impacts would not be significant. Continued ORV use on cherrystem roads and vehicle ways in the northern part of the WSA would disturb these birds due to the presence of people and the noise of the vehicles. Vehicle travel down the eastern boundary road of the WSA would disturb T&E species in the Left Fork of Markham Creek. Because use levels are low and the noise is temporary, impacts would not be significant.

CONCLUSION. Maintenance of riparian habitat in the Left Fork of Markham Creek would benefit T&E wildlife. Existing military, livestock and ORV uses would have minor impacts on T&E species.

All Wilderness would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*, except that ORV use on vehicle ways in the northern part of the area recommended for wilderness would be prohibited, eliminating this impact on black hawks, bald eagles and northern beardless tyrannulets.

CONCLUSION. *All Wilderness* would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except ORV use on vehicle ways in the northern part of the area recommended for wilderness would be prohibited, eliminating impacts on T&E species.

Enhanced Wilderness would have essentially the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*. The only difference is that ORV use on the vehicle way beyond Brushy Tank would be prohibited, eliminating adverse impacts on the T&E birds in that part of the area recommended for wilderness.

CONCLUSION. *Enhanced Wilderness* would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use of the vehicle way beyond Brushy Tank would be prohibited, eliminating adverse impacts on T&E species.

GILA BOX

Proposed Action and *No Wilderness (No Action)* would have beneficial and adverse impacts on T&E wildlife. To improve broadleaf riparian vegetation and to manage livestock use along the Gila and San Francisco Rivers, BLM is fencing the river canyon use and planting riparian trees to reestablish the stands that once existed. These projects would improve riparian habitat and populations of T&E species. To expand the distribution of threatened and endangered fish and wildlife, BLM, in cooperation with AGFD and U.S. Fish and Wildlife Service will reintroduce the federally-listed endangered woundfin and the State-listed desert bighorn sheep. These reintroduction efforts would expand populations and distribution of these T&E species and aid in their survival.

The existing ORV use of the river canyons would have a low impact on T&E species. The noise created by ORVs traveling up the river canyon would disturb the T&E bird species that inhabit the canyon. When desert bighorn sheep are released, the noise of ORVs would also disrupt them. Use levels, however, are not very high and the noise created by the engines is temporary. Livestock grazing would continue on the tablelands above the river canyon creating some competition between cattle and bighorn sheep for forage and space.

CONCLUSION. Riparian rehabilitation efforts and reintroduction of woundfin and desert bighorn sheep would benefit T&E wildlife. The existing ORV and livestock uses would result in a low impact on T&E species.

All Wilderness. All Wilderness would have the same impacts on T&E wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that ORV use would not be permitted in the river canyons. As a result, the noise and presence of vehicles would not disrupt T&E wildlife.

CONCLUSION. *All Wilderness* would have the same impact on T&E wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that ORV use would be prohibited, eliminating that impact.

Enhanced Wilderness would have the same impact on T&E wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that ORV use would be prohibited on the Gila River downstream of its confluence with the San Francisco River. As a result, the impact of ORVs on the T&E wildlife would be eliminated. Upstream of the confluence (the area not recommended for wilderness), impacts on T&E species would be the same as the *Proposed Action* and *No Wilderness (No Action)*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on T&E wildlife as the *Proposed Action* and *No Wilderness (No Action)* except that ORVs (and their impacts) would not be allowed downstream of the Gila and San Francisco River confluence. Upstream of the confluence, ORV use would continue with the same impacts on T&E species as the *Proposed Action* and *No Wilderness (No Action)*.

Moderate Wilderness would have the same impact on T&E wildlife as *All Wilderness* downstream of Eagle Creek (the area recommended for wilderness). Upstream of Eagle Creek, impacts on T&E wildlife would be the same as *Proposed Action* and *No Wilderness (No Action)*.

CONCLUSION. *Moderate Wilderness* would have the same impact on T&E wildlife as *All Wilderness* downstream of Eagle Creek and the *Proposed Action* and *No Wilderness (No Action)* upstream of Eagle Creek.

TURTLE MOUNTAIN

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)* would have no significant impact on T&E wildlife that inhabit the WSA. Existing military overflights would not disturb the bald eagles or peregrine falcons because the flights are flown at medium (1,500 feet) to high (51,000 feet) altitudes above the WSA and the noise is temporary (one minute). Construction of livestock facilities would disrupt T&E species in the area of the project sites, but the facilities are small scale and disturbance of T&E species would not be significant. Existing recreation uses (hiking, hunting and ORV use) would have little impact on the T&E species because use levels are very low (about 225 RVDs total per year) and would not increase significantly in the future (about 500 RVDs total per year).

CONCLUSION. The *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* would have no significant impact on T&E wildlife. Existing military, livestock and recreation uses would continue without causing impacts on bald eagles and peregrine falcons.

All Wilderness would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except ORV use would not be permitted, livestock facilities would not be built and these activities' impacts would be eliminated.

CONCLUSION. *All Wilderness* would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except ORV use and construction of livestock facilities would not be permitted, eliminating the impacts on T&E species.

Canyons draining the southern slopes of Turtle Mountain WSA begin a precipitous drop to the Gila River, 3,500 feet below the summit of Turtle Mountain.

Enhanced Wilderness would have essentially the same impacts on T&E wildlife as *All Wilderness*. The only difference is that some range improvements would be built in the southern part of the WSA not recommended for wilderness. Construction of these facilities would have the same impact on T&E species as described in the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on T&E wildlife as *All Wilderness* in the area recommended for wilderness and the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* in the area not recommended for wilderness.

JAVELINA PEAK

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)*. The only T&E species thought to exist in the WSA (see Table 3-9) is the peregrine falcon. Under these alternatives there would be no resource uses that would significantly impact the peregrine falcon. These birds do not nest or forage in the WSA, but probably fly over, stopping occasionally to rest and feed. Military overflights would disrupt the falcon but not significantly because of altitudes (1,500 to 51,000 feet) and duration (about one minute).

CONCLUSION. These alternatives would not significantly impact T&E wildlife.

All Wilderness would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. *All Wilderness* would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.

Enhanced Wilderness would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.

PELONCILLO MOUNTAINS

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)* would benefit T&E wildlife and their habitat. BLM and AGFD would release desert bighorn sheep into the WSA to expand their distribution and to aid in their survival. In conjunction with the release, two water sources would be maintained to enhance sheep habitat by providing dependable water sources where previously natural water was only seasonal.

Continuation of existing livestock and ORV uses would have minimal impact on T&E wildlife. The ORV use in Little Doubtful Canyon would disturb T&E wildlife but use levels are so low (50 RVDs annually) that the impact would not be significant. Livestock water developments would be constructed disturbing T&E species during construction, but these waters would also provide additional water for T&E wildlife. Some competition would result between cattle and bighorn sheep but suitable habitat exists for both.

CONCLUSION. Under these alternatives, bighorn sheep releases and wildlife water developments would improve T&E wildlife habitat and populations. Continued livestock and ORV uses would not significantly impact T&E species.

All Wilderness would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except that ORV use in Little Doubtful Canyon would not be permitted eliminating this minimal impact.

CONCLUSION. *All Wilderness* would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)* except that

ORV use in Little Doubtful Canyon would be prohibited, eliminating this minimal impact.

Enhanced Wilderness would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on T&E wildlife as the *Proposed Action*, *Moderate Wilderness* and *No Wilderness (No Action)*.

DOS CABEZAS MOUNTAINS

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)*. The only T&E species thought to exist in the WSA is the peregrine falcon (see Table 3-9). Existing low-level, military overflights would disturb the peregrine but impacts would not be significant because the noise created by the aircraft is temporary (one minute). Outside the area recommended for wilderness, a mine would be developed in Buckeye Canyon. If the peregrine falcon were present in Buckeye Canyon, the noise associated with the mining operations and the presence of people would disrupt it and cause it to leave the area. The impact would not be significant, however, because the peregrine falcon is not a resident of the WSA; it only passes over during migration and stops briefly to rest and feed.

CONCLUSION. In the area recommended for wilderness, there would be no significant adverse impact on T&E wildlife. Military overflights would temporarily disrupt the peregrine falcon. In Buckeye Canyon (an area not recommended for wilderness) development of a mine would disrupt the peregrine, causing it to leave the area.

All Wilderness would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness*, except that impacts of mining development on the peregrine would also occur in the area recommended for wilderness.

CONCLUSION. *All Wilderness* would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness*.

Enhanced Wilderness would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *Enhanced Wilderness* would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action) would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *No Wilderness (No Action)* would have the same impact on T&E wildlife as the *Proposed Action* and *Moderate Wilderness*.

Oaks densely cover the bottom of Little Doubtful Canyon in Peloncillo Mountains WSA.

IMPACTS ON CULTURAL RESOURCES

Wilderness designation would protect and preserve cultural resources for socio-cultural, scientific, educational and conservational purposes, providing such uses conform to wilderness and cultural resource management objectives. Prehistoric and historic sites are continually subject to deterioration by natural processes. Far more damaging, however, are human disturbances through resource development and increased access. Impacts of a proposed development would be mitigated before the project began, but new access into previously remote areas increases the number of visitors and the potential for vandalism.

Cultural resources would generally benefit from wilderness designation. Surface disturbance significantly impacting cultural resources would be restricted and mitigated or prohibited. Some restriction on archaeological studies could result primarily in terms of access and excavation. The increased visitation that often accompanies wilderness designation of an area could also impact cultural resources through increased collection of artifacts. It is difficult to predict, however, whether significant increases in visitor use would occur.

The *Proposed Action* would designate portions of Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs as wilderness and would protect as many as 41 prehistoric sites (20 National Register Quality (NRQ) sites), and one known historic site (no NRQ sites). Historic site potential varies from low to high and prehistoric site potential varies from moderate to high. Under the *Proposed Action*, site significance in the WSAs is moderate to high.

All Wilderness and *Enhanced Wilderness* would designate all or portions of each WSA as wilderness. Designation would protect and preserve as many as 71 prehistoric sites (26 NRQ sites) and 12 known historic sites (three NRQ sites). Although site potential and significance vary from high to low in the WSAs, these alternatives would designate Black Rock, Fishhooks, Gila Box, Peloncillo Mountains and Dos Cabezas Mountains WSAs, all of which have both high prehistoric site potential and significance (see Table 3-10).

Moderate Wilderness would designate as wilderness portions of Needle's Eye, Black Rock, Fishhooks, Gila Box and Dos Cabezas Mountains WSAs, providing added protection to as many as 51 prehistoric sites (20 NRQ sites) and two historic sites (no NRQ sites). The prehistoric site potential of these areas varies from moderate to high, whereas historic site potential varies from low to high. Site significance in all WSAs is moderate to high.

Under *No Wilderness (No Action)* no WSAs would be designated wilderness, and cultural resources would not benefit from this designation. Although BLM policy and public law protect cultural resources, *No Wilderness (No Action)* would not provide the same degree of protection that is provided by designation, because surface-disturbing activities could still occur.

There are no anticipated land use actions that would significantly impact cultural resources except in Black Rock, Turtle Mountain and Dos Cabezas Mountains WSAs where mining and a request for access to inholdings would occur. The following discussion will analyze impacts on cultural resources in those three WSAs.

BLACK ROCK

Under all alternatives, a small mine would be developed north of Jackson Mountain in the eastern part of the WSA. Development and production would result in about 10 acres of surface disturbance. Although cultural resource site density and significance are high in this WSA, the key areas for discovery of sites are along Black Rock Creek and major tributaries. Because the mining development is in the mountainous part of the WSA away from the key areas, no significant adverse impact on cultural resources would result.

CONCLUSION. Because the mining operation would be in the mountainous part of the WSA, away from known key areas of cultural importance (Black Rock Creek and major tributaries), impacts on cultural values would not be significant.

TURTLE MOUNTAIN

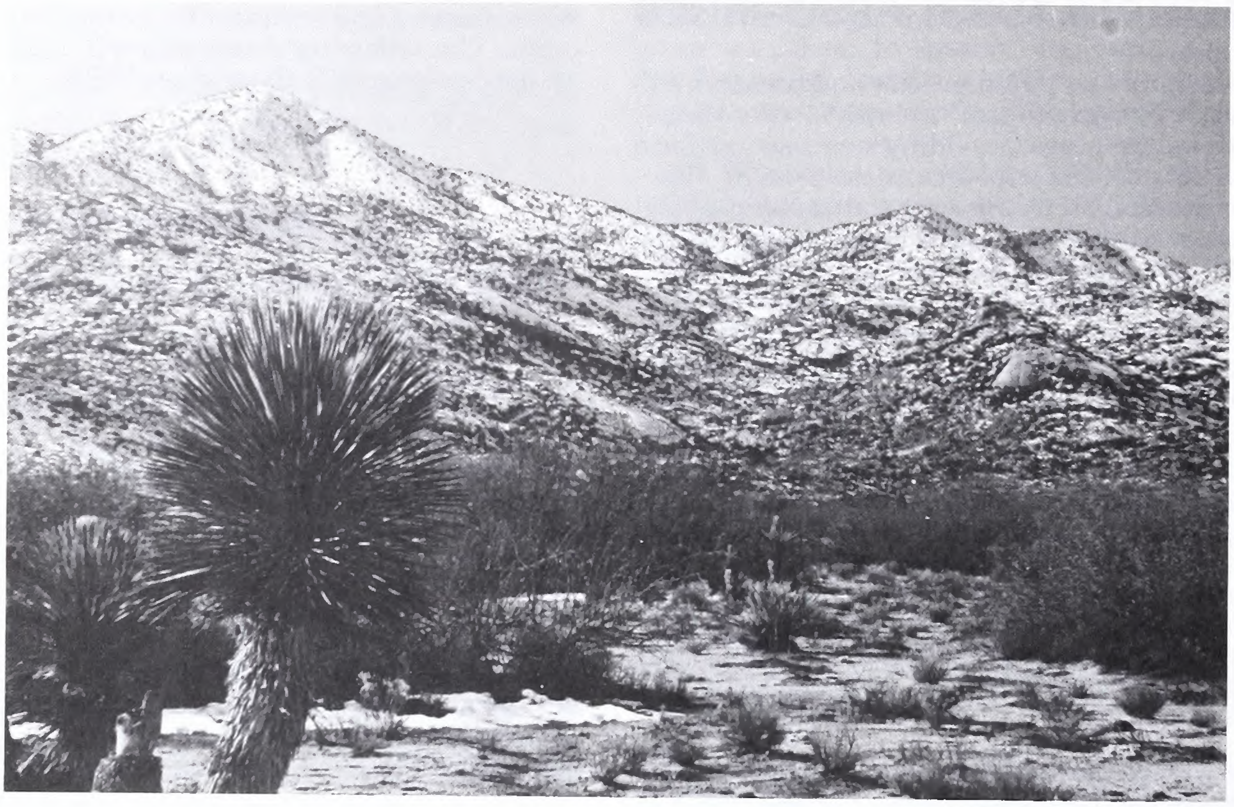
Under all alternatives, a request for access to the state inholding in South Smith Canyon would be made. The BLM must provide adequate and reasonable access to state inholdings so the intended use of the state land can be realized. If it is determined that the only adequate and reasonable access is by vehicle over a road, construction would either physically impact the historic Safford-Morenci Trail or at least significantly impact the integrity of the trail if a road were built paralleling the trail.

CONCLUSION. Road construction for access to the state inholding would significantly impact the historic Safford-Morenci Trail.

DOS CABEZAS MOUNTAINS

Under all alternatives, the Buckeye and Apache Mines would be developed in Buckeye Canyon in the extreme western part of the WSA. Through the development of the mines, the historic values of these old mining sites would be significantly impacted. Modern mining technology and road building would adversely impact the old mine sites and the pack trail leading from the Buckeye Mine.

CONCLUSION. The historic nature of the Buckeye and Apache Mines would be significantly impacted by modern-day development and production at the mines.



Government Peak, just under 7,600 feet high, marks the high point on the east side of the Dos Cabezas Mountains in Happy Camp Canyon WSA.

IMPACTS ON PALEONTOLOGICAL RESOURCES

Paleontological resources are present in two of the nine WSAs, Needle's Eye and Javelina Peak. The limestone beds in Needle's Eye WSA have numerous invertebrate fossils and Javelina Peak WSA has two known vertebrate fossil sites with high potential for additional sites. Wilderness designation would protect and preserve these resources by restricting or prohibiting surface disturbances, designation could result in increased visitor use and increased fossil collecting. Since fossils are in Needle's Eye and Javelina Peak, the following analysis will address only these two WSAs.

NEEDLE'S EYE

Proposed Action and *Moderate Wilderness* would designate 9,201 acres of the WSA as wilderness, preserving the WSA's invertebrate fossils. Continued military, livestock, recreation, utility and wildlife uses of the area recommended for wilderness would have no impact on fossil resources because no major surface-disturbing activities would occur that would significantly impact fossils.

CONCLUSION. The *Proposed Action* and *Moderate Wilderness* would preserve the fossils located in the area recommended for wilderness. Existing uses would have no impact on fossils.

All Wilderness and *Enhanced Wilderness* would have the same impact on fossils as the *Proposed Action* and *Moderate Wilderness*.

CONCLUSION. *All Wilderness* and *Enhanced Wilderness* would have the same impact on fossils as the *Proposed Action* and *Moderate Wilderness*.

No Wilderness (No Action). Under this alternative, road construction from the vehicle way in the eastern part of the WSA to Dick Spring would disturb approximately 10 acres of the ground and invertebrate fossils, if present.

CONCLUSION. Road construction to Dick Spring would disturb about 10 acres of ground, adversely impacting any fossils present along the route.

JAVELINA PEAK

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)* would allow ORV use on the dunes in the southern part of the WSA to continue. If undiscovered fossil sites were located near the surface, ORVs would adversely impact the fossils while driving over them. Because fossils have been found in the badlands north and east of the dunes and most ORVs drive in the dunes, significant impacts on fossils would not occur. As use increases, however, and if ORVs begin using the badlands adjacent to the dunes, impacts on fossils may occur.

CONCLUSION. No significant impacts on fossils are anticipated from current ORV use levels, but as use increases in the next 10 years fossils could be damaged.

All Wilderness would generally protect fossils. ORV use would not impact fossils because they would not be allowed under this alternative.

CONCLUSION. *All Wilderness* would have no adverse impact on fossils.

Enhanced Wilderness would have the same impact on fossils as *All Wilderness* because most of the badlands, where fossils are found, would be designated wilderness and ORV use would not be allowed.

CONCLUSION. *Enhanced Wilderness* would have the same impact on fossils as All Wilderness.

IMPACTS ON VISUAL RESOURCES

Areas designated wilderness would be managed as visual resource management (VRM) class I areas, a classification given to protect the scenery of areas under special management. In Class I areas, visual resource management emphasizes natural ecological changes but allows limited management activities. Changes in the visual environment must not attract attention. Natural features should dominate the landscape.

A variety of resource management activities may be proposed for the public lands, varying from simple wildlife or livestock waters to pipelines or powerlines and complex mining operations. The VRM classification and the degree of contrast permitted on the landscape are determined by the scenic quality of the area, human sensitivity to the scenic quality and the distance from which the landscape is viewed.

Depending on the nature of the project, VRM Classes III and IV generally pose fewer restrictions on layout, design and construction of proposed developments and allow contrasts in the landscape to be somewhat more evident. Proposals in Class II, and especially Class I, areas are more restricted, and the management objectives permit little or no evident change in the landscape.

CONCLUSION. All areas designated wilderness would be managed by VRM Class I objectives. This designation would preserve the scenery of wilderness areas by restricting or prohibiting activities that would be unnatural in the landscape. *No Wilderness (No Action)* would not significantly affect the scenic quality of the WSAs because BLM would continue to manage them according to VRM class objectives identified through the land use planning process. Table 4-4 shows the acreage that would be managed under each VRM class by WSA and alternative.

IMPACTS ON ECONOMIC CONDITIONS

Wilderness designation may restrict, preclude or enhance activities that would alter economic conditions. Although specific information does not exist to quantify most impacts, designation is expected to have some economic impact on livestock grazing, recreation and possibly mining. Because a major portion of the impact is expected in Gila, Graham and Greenlee Counties, this analysis includes only the impacts on these areas on a regional and local basis.

REGIONAL IMPACTS

Livestock Grazing. Agricultural proprietorships make up 3% (804) of the total employment in the three-county region, and earned slightly more than $29 million in 1981, about 6% of the total personal income in the region. Of the 804 agricultural proprietorships, 270 were identified as ranchers and represent slightly more than 1% of the three-county area work force. These ranchers collectively grazed about 49,700 head of livestock.

Within the EIS area, livestock grazing occurs on 34 allotments (ranches) in the nine WSAs. In 17 allotments (three WSAs—Gila Box, Javelina Peak and Peloncillo Mountains), livestock grazing would be unaffected by wilderness management as no new management practices or range facilities are proposed. Several range facilities are planned in Needle's Eye, Black Rock, Fishhooks, Day Mine and Dos Cabezas Mountains WSAs. These WSAs are also unaffected because these projects would be constructed whether the area is designated or not. In Turtle Mountain WSA, grazing would be adversely impacted under *All Wilderness* and *Enhanced Wilderness*.

In Needle's Eye, Black Rock, Fishhooks, Day Mine and Dos Cabezas Mountains WSAs, proposed livestock facilities would be built but the design or location of the projects could need adjustments to minimize impacts on wilderness values (naturalness). As a result, ranch operating costs could increase and margins of profit could decrease. Increased operating costs, however, would not prohibit continued ranching operations.

In Turtle Mountain WSA, wilderness designation would preclude the construction of planned facilities and prevent the development of the range to its full potential. Thus the number of livestock permitted to graze would fall 660 AUMs short of its potential (299 AUMs within the WSA).

The ranchers who would be impacted by wilderness management make up 1.1 % of the ranchers in the three-county area. These impacted ranchers collectively contributed less than 1% of the personal income to the economy of the three-county area.

CONCLUSION. None of the alternatives would have a significant impact on the regional economy as the adversely affected ranchers in the Turtle Mountain WSA contribute less than 1% of the personal income to the economy of the three counties.

TABLE 4-4
VRM CLASS ACREAGE*

Bureau of Land Management
Safford District, Arizona

VRM Class	Proposed Action	All Wilderness	Enhanced Wilderness	Moderate Wilderness	No Wilderness
NEEDLE'S EYE					
I	9,716	9,716	9,716	9,716	9,716
III	0	0	0	0	0
IV	0	0	0	0	0
BLACK ROCK					
I	8,492	8,492	8,492	8,492	8,492
III	0	0	0	0	0
IV	0	0	0	0	0
FISHHOOKS					
I	10,883	15,215	15,215	10,883	6,730
III	0	0	0	0	0
IV	4,332	0	0	4,332	8,485
DAY MINE					
I	1,630	17,309	12,362	1,630	1,630
III	0	0	0	0	0
IV	15,679	0	4,947	15,679	15,679
GILA BOX					
I	15,667	17,831	17,351	16,691	15,667
III	0	0	0	0	0
IV	2,164	0	480	1,140	2,164
TURTLE MOUNTAIN					
I	3,620	17,422	12,724	3,620	3,620
III	0	0	0	0	0
IV	13,802	0	4,698	13,802	13,802
JAVELINA PEAK					
I	9,520	18,853	10,340	9,520	9,520
III	0	0	0	0	0
IV	9,333	0	8,513	9,333	9,333
PELONCILLO MOUNTAINS					
I	5,600	12,317	10,638	5,600	5,600
III	0	0	0	0	0
IV	6,717	0	1,679	6,717	6,717
DOS CABEZAS MOUNTAINS					
I	11,921	18,509	15,195	11,921	5,822
III	0	0	0	0	2,240
IV	6,588	0	3,314	6,588	10,447

*None of the WSAs were managed as Class II or V before the wilderness review.

Source: Safford District Files

Recreation. Little data exist on the actual recreation use of public lands, although general areas of use and types of users are known. The Recreation section of Chapter 3 includes professional estimates of recreational use levels.

A part of the retail trade and service sectors of the economy reflect expenditures by recreationists. In the three-county region (1981), the retail trade and services sectors employed 7,127 people and contributed $71 million to the economy. Estimates from the census of Retail Trade and the census of selected Services indicated that about 38% of the total income and employment from the retail trade and services sectors can be attributed to recreation related expenditures. Based on this relationship, 2,708 of the 7,127 workers would earn $27 million from recreation-related businesses.

Tourism and travel totaled $170 million from 1980 to 1981 (indexed from 1980 to 1981 Arizona Statistical Review). Based on these business receipts, each of the 2,708 employees would take in about $63,000 per year.

In order to increase the personal income attributable to the trade and services sectors by 1%, more than $4.4 million (298,200 visits at $15 per recreation visit) in gross receipts would have to be collected by 71 employees. The trade and services sectors compose only 15% of the total labor related personal income in the three-county area.

Under wilderness designation significant change in total recreation use is not expected. Recreationists such as hunters would not be able to travel into WSAs by off-road vehicles (ORV), but they will have several alternatives to ORV travel. They can travel the edge of the wilderness area and hike in, they can visit a nondesignated area with wilderness character or they can choose not to recreate in such areas. Because significant portions of these WSAs are inaccessible to motor vehicles, recreation use within them is not likely to change much with wilderness designation. Publicity through the designation process would result in greater visitor use, but increases in use would not be sufficient to significantly change regional income.

CONCLUSION. None of the alternatives would have a significant impact on the regional economy. Visitor use, attributable to wilderness, is not expected to increase even the 298,200 recreation visitor days needed to increase income in the three-county area 1%.

Minerals. In 1981 mining and manufacturing (primary metals, smelting) in the three-county areas provided 32% (8,186 jobs) of the total employment and 53% ($254 million) of the total personal labor-related income.

Copper production in Gila County totalled 303,264,800 pounds valued at $253,966,074 ($.837 per pounds) in 1981. The value of all mineral produced in the county was $292,459,000 including such minerals as gold, silver and molybdenum. Copper production in Greenlee County, in 1981, totalled 387,861,000 pounds valued at $324,810,315 ($.837 per pound). The value of all minerals produced in Greenlee County in 1981 was $349,178,000. Mineral production in Graham County, compared to Gila and Greenlee County, was insignificant, totalling $13,000.

The total impact of wilderness designation on mineral development and the economy of the nine WSAs is not known. Mineralization in the three-county area and the area's economic dependency on mining are apparent from examining income and employment for the three counties. Economic impacts resulting from the development of any deposits found would depend on the size of the deposit, ore percentages, mineral values and state of technology. Low copper values resulting in reduced production have contributed significantly to unemployment in the mineral industry, but this situation could change in a relatively short time.

The northern ridges and slopes of Jackson Mountain are typical of the steep and rocky terrain in much of Black Rock WSA.

If the number of mining claims is any indication of the probability of the existence of economic deposits that will be developed, the likelihood of economic impacts on mineral development would decrease with a reduction in the amount of acreage designated wilderness under each alternative.

CONCLUSION. While the total impact of wilderness management on mineral production is not known, none of the alternatives would have a significant impact on the regional economy.

LOCAL IMPACTS

No significant local economic impacts would occur from designation of any WSAs except for Gila Box and Turtle Mountain, which are discussed in the following section.

GILA BOX

Proposed Action and *No Wilderness (No Action)* would not designate Gila Box WSA as wilderness and, therefore, would not affect expenditures generated by present recreation uses. The ORV travel would continue as the predominant recreational use of the Gila Box WSA.

CONCLUSION. Nondesignation under the *Proposed Action* and *No Wilderness (No Action)* would not adversely affect expenditures generated by ORV use.

All Wilderness. Off-road vehicle (ORV) users spent an estimated 1,000 recreation visitor days (RVDs) annually in the Gila Box. Wilderness designation would potentially reduce the local sales attributable to such recreation by $15,000 (1,000 RVDs x $15.00/RVD). Realistically, however, ORV use would probably shift to other nearby areas and floatboating and hiking use would increase, reducing the overall impact on the local economy to something less than $15,000. In the next 10 years, wilderness recreation uses would increase to 3,500 RVDs under this alternative, reducing the impact of lost ORV expenditures. In Graham and Greenlee Counties, business income attributable to recreation totalled $45.4 million in 1981. If $15,000 of expenditures generated by ORV use were lost, it would amount to less than 1 percent of the revenue generated by recreation in the two counties.

CONCLUSION. *All Wilderness* would not have a significant impact on revenue generated by recreation in the two counties.

Enhanced Wilderness would exclude from the area recommended for wilderness additional miles of the Gila and San Francisco Rivers in the WSA, leaving them available for continued ORV use. Under this alternative, an estimated 500 RVDs of ORV use would be precluded and $7,500 in business income would be lost. As under *All Wilderness*, however, use is expected to shift to other nearby areas and non-motorized uses would increase to 3,500 RVDs per year (in the next 10 years), reducing the overall economic impact.

CONCLUSION. *Enhanced Wilderness* would not have a significant impact on revenue generated by recreation in the two counties.

Moderate Wilderness would have the same impact on revenue generated by recreation use of the WSA as *Enhanced Wilderness*.

CONCLUSION. *Moderate Wilderness* would have the same impact on revenue generated by recreation use of the WSA as *Enhanced Wilderness*.

TURTLE MOUNTAIN

Proposed Action, *Moderate Wilderness* and *No Wilderness (No Action)* would have no economic impacts on livestock grazing in Turtle Mountain WSA.

CONCLUSION. Nondesignation of Turtle Mountain WSA would not affect the local economy.

All Wilderness. Although range facilities do not necessarily conflict with wilderness, in Turtle Mountain WSA the cumulative impacts of planned projects beyond those that already exist would impair natural values. Under this alternative, projects proposed by the AMPs would not be built and the stocking rate of two allotments would be held below the projected carrying capacity by 660 AUMs annually, resulting in a potential annual earnings loss of $3,300. This analysis is based on an average income for an AUM of $5.00 (BLM 1981a). Because of the inability to fully stock the range, ranch values of the two allotments would not increase to their potential—an estimated $1,500 per animal unit or $26,600 and $55,900 respectively (BLM 1981a). The income and ranch values foregone in Turtle Mountain WSA are estimated to amount to 8.3 percent of existing values.

CONCLUSION. Wilderness designation of Turtle Mountain WSA would have an adverse impact on local ranchers, but the impact on the local economy would be slight.

Enhanced Wilderness would have the same impacts as *All Wilderness* except the stocking rate of only one allotment would be affected. Under *Enhanced Wilderness*, the

The view southwest from Bellmeyer Saddle along the Safford-Morenci Trail in Turtle Mountain WSA offers a magnificent panorama of the Gila Mountains.

stocking rate would be held below the projected carrying capacity by 447 AUMs annually, resulting in a potential annual earning loss of $2,235. Ranch values would not increase to their full potential—by about $55,900.

CONCLUSION. Wilderness designation of Turtle Mountain WSA would adversely impact one local rancher, but impacts on the local economy would be slight.

IMPACTS ON SOCIAL ELEMENTS

POPULATION

Implementing the *Proposed Action* or any of the alternatives would not result in any significant change in population trends or totals at the local, county or regional level. None of the alternatives would cause an appreciable change in the economy or quality of life at any level and as a result, population would not be affected.

CONCLUSION. Implementing the *Proposed Action* or any of the alternatives would not result in any significant change in population trends or totals at any level.

PUBLIC ATTITUDES AND PERCEPTIONS

During the wilderness study and the preparation of this EIS, the residents of southeastern Arizona and southwestern New Mexico were interviewed to determine their attitudes and perceptions about wilderness. In addition, in August 1982, the Arizona State Office of the BLM conducted a public opinion survey concerning wilderness (BLM 1983). These attitudes about wilderness were solicited separately from public comment on BLM's proposals in the draft EIS released in June, 1983. The public comments on the proposals made in the draft EIS and responses to these comments may be found in the Comments and Responses section of this document. An analysis of the impacts of each alternative on public attitudes and perceptions solicited during the preparation of this EIS may be found in Appendix No. 4, Impacts to Public Attitudes and Perceptions.

MITIGATING MEASURES

The *Proposed Action* generates a number of environmental impacts on virtually every resource discussed in this analysis. A variety of mitigating measures are available to eliminate or reduce impacts resulting from the *Proposed Action*. Specific mitigating measures selected for implementation would be developed and discussed in wilderness management plans for those areas recommended for wilderness and in resource management plans or project-specific environmental analyses for those areas not recommended for wilderness. The following is a discussion, by resource and affected WSA, of the impacts of the *Proposed Action* and mitigating measures.

WATER QUALITY

DOS CABEZAS MOUNTAINS. The mining operation in Buckeye Canyon would disturb 115 acres of land, resulting in increased levels of sediment and degraded water quality during periods of streamflow. Use of chemicals and fuels in the operation, if not properly used and stored, would also degrade water quality. Mitigating measures would be developed in the mining plan of operations to prevent undue and unnecessary degradation of the environment including water quality.

WATER SUPPLY

No significant impacts on water supply would occur under the *Proposed Action*.

VEGETATION

BLACK ROCK. Development of a mine north of Jackson Mountain, an area not recommended for wilderness, would remove about 10 acres of vegetation. The impact on vegetation would be mitigated through reclamation of disturbed soils and either artificial or natural revegetation.

DOS CABEZAS MOUNTAINS. Development of a mine in Buckeye Canyon, an area not recommended for wilderness, would disturb about 115 acres of vegetation through road building and mining operations. The impact on vegetation would be mitigated through reclamation of disturbed soils and either artificial or natural revegetation.

THREATENED AND ENDANGERED PLANTS

No significant impacts on threatened and endangered plants would occur under the *Proposed Action*.

AIR QUALITY

No significant impacts on air quality would occur under the *Proposed Action*.

WILDERNESS VALUES

NEEDLE'S EYE. The powerline crossing the WSA requires patrolling for maintenance needs every 90 days. The noise of the helicopter would impact opportunities for solitude during inspection (approximately 30 minutes). Impacts to solitude would be reduced, though not eliminated, through coordination with the Bureau of Indian Affairs to schedule flights during periods of low visitor use.

The noise of low-level, military training flights would temporarily impact solitude during overflights of the area recommended for wilderness (about one minute long). Impacts to solitude would be reduced, but not eliminated, through coordination with the U.S. Air Force and the Air

National Guard to schedule flights during low visitor use periods or slightly reroute aircraft away from popular use areas. Further development of livestock facilities would be mitigated through stipulations on location and design.

BLACK ROCK. Some of the lands not designated wilderness would lose their wilderness character as a result of mineral activity north of Jackson Mountain. Mitigation provided through the mining plan of operations would reduce the impact on the wilderness values of the nondesignated part of the WSA. The impact on wilderness values by development of livestock facilities would be mitigated through stipulations on location and design.

FISHHOOKS. The noise of low-level, military training flights would temporarily impact solitude during overflights of the area recommended for wilderness (about one minute long). Impacts on solitude would be reduced, but not eliminated, through coordination with the U.S. Air Force and the Air National Guard to schedule flights during low visitor use periods or slightly reroute aircraft away from popular use areas. Impacts on the natural qualities of further livestock facilities in the wilderness would be mitigated through stipulations on location and design.

DAY MINE. The noise of low-level, military training flights would temporarily impact solitude during overflights of the WSA (about one minute long). Impacts to solitude would be reduced, but not eliminated, through coordination with the U.S. Air Force and the Air National Guard to schedule flights during low visitor use periods or slightly reroute aircraft away from popular use areas. Impacts of further livestock development on the natural values of the WSA would be mitigated through stipulations on design and location.

GILA BOX. Continued ORV use of the river canyons would impact opportunities for solitude. The impacts, however, would be temporary with no lasting physical impacts on the natural values of the WSA. In order to mitigate impacts on solitude, the amount of ORV use and the period of time ORVs use the canyons would have to be controlled.

TURTLE MOUNTAIN. Impacts of access to the state inholding would be reduced by selection of a route and mode of travel that would satisfy the intended use of the inholding while minimizing impacts on wilderness values. Access would not necessarily have to be by vehicle along an established road. Further development of range and wildlife facilities would be mitigated through stipulations on location and design but because the WSA currently contains the maximum allowable evidence of man, no mitigation short of not building the facilities would prevent the loss of natural values.

JAVELINA PEAK. Increased ORV use of the dunes would impact the natural character and opportunities for solitude. In order to mitigate these impacts, the amount of use and the period of time ORV use the dunes would have to be controlled.

PELONCILLO MOUNTAINS. No significant impacts on wilderness values would occur in this WSA under the *Proposed Action*.

DOS CABEZAS MOUNTAINS. Mineral development in Buckeye Canyon would be mitigated through preparation of surface protection stipulations in the mining plan of operations. Because of the nature of the topography, soils and climate, total reclamation of disturbed areas would not be possible.

The noise of low-level, military training flights would temporarily impact solitude during overflights of the area recommended for wilderness (about one minute long). Impacts to solitude would be reduced through coordination with the U.S. Air Force and the Air National Guard to schedule flights during low visitor use periods or slightly reroute aircraft away from popular use areas.

MINERALS AND ENERGY

Lands designated wilderness would be closed to use under the mining and mineral leasing laws. Exploration and potential production would not be permitted except on valid existing claims and leases. Otherwise, mineral and energy resource information collection would occur only in a manner that would not impair wilderness values. Lost opportunity for exploration and development would not be mitigated. Areas not designated wilderness would be explored and developed consistent with 43 CFR 3809, Surface Management of the Public Lands Under the U.S. Mining Laws. Environmental impacts would be mitigated through environmental analysis and stipulations to the mining plan of operations.

No significant impacts on mineral and energy development would occur under the *Proposed Action*.

LIVESTOCK GRAZING

No significant impacts would occur to construction of range facilities, implementation of grazing systems or cattle numbers under the *Proposed Action*. To facilitate ranching operations, road construction is proposed in Needle's Eye WSA but would not be permitted. Alternate, nonimpairing methods of access would have to be used to accomplish the rancher's purpose because road construction could not be mitigated.

RECREATION

In areas designated wilderness, lost ORV opportunities could not be mitigated. Use would have to shift to other nearby, available areas. Continued ORV use in Gila Box and Javelina Peak WSAs would impact opportunities for solitude sought by hikers and backpackers. To mitigate this impact, the amount of ORV use and the period of time ORVs use the WSAs would have to be controlled.

WILD AND SCENIC RIVERS

There would be no significant impact on wild and scenic river values in either Needle's Eye or Gila Box WSAs. In the Gila Box, continued ORV use would temporarily impact opportunities for solitude in the river canyon. To mitigate this impact, the amount of use and period of time ORVs use the river canyon would have to be controlled.

LAND USE

NEEDLE'S EYE. The impact of wilderness on use of three damsites withdrawals could not be mitigated. The dams, however, would not be constructed.

BLACK ROCK. Increased use of the Black Rock Road (a public road) could result from wilderness designation. Visitor use problems would be reduced through the efforts of the BLM to educate recreationists of the presence of private and Reservation lands, and the appropriate behavior while on these lands.

TURTLE MOUNTAIN. Impacts on access to the state inholding would be reduced through selection of a route and mode of travel least impacting to the wilderness resource while serving the intended purpose of the State section. Adequate access to the inholding cannot be denied.

WILDLIFE

NEEDLE'S EYE. The impacts of noise from military overflights, helicopter flights along the powerline and ORV use would be mitigated by controlled ORV use and consultation with the Bureau of Indian Affairs, U.S. Air Force and Air National Guard to schedule flights and routes that would have the least impact on wildlife.

BLACK ROCK. Impacts on wildlife caused by mining operations north of Jackson Mountain would be mitigated through development of stipulations in the mining plan of operations.

FISHHOOKS. The impacts on wildlife of noise from military overflights and ORV use would be mitigated by controlled ORV use and consultation with the U.S. Air Force and Air National Guard to schedule flights and routes that would have the least impact on wildlife.

DAY MINE. The impacts on wildlife of noise from military overflights and ORV use would be mitigated by controlled ORV use and consultation with the U.S. Air Force and Air National Guard to schedule flights and routes that would have the least impact on wildlife.

GILA BOX. The impacts on wildlife of noise from ORV use in the river canyon would be mitigated by controlling the amount of ORV use and the period of time ORVs use the canyon.

TURTLE MOUNTAIN. Impacts of access to the state inholding on wildlife would not be mitigated if the only reasonable means of access is determined to be by vehicle over a road.

JAVELINA PEAK. The impacts of noise from ORVs on wildlife would be mitigated by controlling the amount of ORV use and the period of time ORVs use the dunes.

PELONCILLO MOUNTAINS. No significant impacts on wildlife would occur in this WSA under the *Proposed Action*.

DOS CABEZAS MOUNTAINS. The impacts on wildlife of noise from military overflights and ORV use would be mitigated by controlled ORV use and consultation with the U.S. Air Force and Air National Guard to schedule flights and routes that would have the last impact on wildlife. Impacts to wildlife caused by mining operations in Buckeye Canyon would be mitigated through development of stipulations in the mining plan of operations.

THREATENED AND ENDANGERED WILDLIFE

No significant adverse impacts would occur to T&E wildlife under the *Proposed Action*. In Black Rock and Dos Cabezas WSAs where mines would be developed outside the area recommended for wilderness, adverse impacts on T&E species would be mitigated through stipulations developed for the mining plan of operations.

CULTURAL RESOURCES

In areas not designated wilderness under the *Proposed Action*, cultural resources would not receive the added protection of wilderness management. Significant adverse impacts, however, would be mitigated by stipulations developed in the environmental assessment process. Development of the mine in Buckeye Canyon in the Dos Cabezas

Mountains WSA and a request for access to the state inholding in Turtle Mountain WSA would be mitigated through consultation with the miner and the applicant for access. If the proposed land uses involve National Register Quality sites, consultation with the State Historic Preservation Officer would be required to mitigate significant adverse impacts on cultural resources.

PALEONTOLOGICAL RESOURCES

No significant impacts on paleontological resources would occur under the *Proposed Action*. If increasing ORV use on the dunes in Javelina Peak WSA has adverse impacts on fossils, use would be controlled to prevent damage to the resources.

VISUAL RESOURCES

In areas not designated wilderness under the *Proposed Action*, scenic quality would not always receive the same protection as provided in wilderness areas. However, existing visual resources management classes and objectives would mitigate potential impacts consistent with the quality of the visual resource.

ECONOMIC CONDITIONS

No significant adverse impacts on economic conditions would occur under the *Proposed Action*.

SOCIAL ELEMENTS

No significant impacts on population trends and totals would occur under the *Proposed Action*.

UNAVOIDABLE ADVERSE IMPACTS

A variety of impacts resulted from the *Proposed Action*. In the previous section, many mitigating measures are identified to reduce or eliminate the identified environmental impacts. Under the *Proposed Action*, however, some impacts could not be mitigated.

Wilderness values in the nondesignated parts of Black Rock and Dos Cabezas Mountains WSAs would be unavoidably impacted because mineral development would occur. Access to the state inholding in Turtle Mountain WSAs would result in unavoidable adverse impacts on wilderness values if the only reasonable means of access were by vehicle over an established road. Noise created by military aircraft training over all WSAs except Peloncillo Mountains would be somewhat mitigated through consultation with the U.S. Air Force and Air National Guard but the elimination of noise from the aircraft would not be accomplished.

Lands designated wilderness would be closed to entry under the mining and mineral leasing laws, subject to valid existing rights. Prospecting, exploration and development would be unavoidably impacted under the *Proposed Action* in the designated portions of Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs.

Proposed ranch road building in Needle's Eye WSA would not be permitted. The impacts on the ranching operations would be unavoidable, as roads are not permitted in wilderness.

ORV use would not be permitted on the vehicle ways in Needle's Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs. Motorized vehicles are not permitted in wilderness and these impacts would not be avoided under the *Proposed Action*.

Under the *Proposed Action*, ORV use would continue in Day Mine, Gila Box, Turtle Mountain, Javelina Peak and Peloncillo Mountains WSAs. Impacts to solitude caused by ORV noise would be mitigated through ORV use restrictions. If ORV use were not restricted, however, impacts on solitude would not be avoided.

In Needle's Eye WSA three withdrawals are in effect on the Gila River for potential dams for power generation. Under the *Proposed Action* these dams would not be permitted, without Presidential approval, and adverse impacts would not be avoided.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The *Proposed Action* involves, to varying degrees, irreversible and irretrievable commitments of the wilderness resources. In country as rough and dry as these WSAs, allocation of consumptive uses such as mining would result in irreversible and irretrievable losses of wilderness values over the long term. In the eastern part of Black Rock WSA around the fluorspar mine, and in Buckeye Canyon of Dos Cabezas Mountains WSA, wilderness values (naturalness and opportunities for solitude or primitive recreation) would be lost because of the mineral development. Natural values would be lost over the long term. Opportunities for solitude would be impacted during the life of the mining operation.

RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The nine WSAs would be managed under the Interim Management Policy (IMP) until Congress either releases the areas to other multiple uses or designates them wilderness. The short term is defined, for this analysis, as two or more years after the final EIS is submitted to the President through the Secretary of the Interior. In the short term, all WSAs will be managed by the IMP preserving the wilderness values, subject to valid existing rights.

During the short term, man's environment would not change and wilderness values would be preserved. The effects on long-term productivity would depend on the eventual wilderness designation made by Congress. The following is a discussion of short- and long-term effects.

NEEDLE'S EYE. In the short term, the environment would not be affected and wilderness values would be maintained. Under the *Proposed Action* 9,201 acres would be designated wilderness preserving, in the long term, the wilderness values of this area.

BLACK ROCK. In the short term, wilderness values would be preserved and man's environment would not change. Long-term productivity would not differ in the 6,590 acres of designated wilderness because management would emphasize the preservation of wilderness values. In the northeastern part of the WSA not designated wilderness, short-term preservation of wilderness values would give way to mineral production in the long term.

FISHHOOKS. Under the *Proposed Action*, the short-term preservation of wilderness values would continue in the long term.

DAY MINE. Under the *Proposed Action*, none of the WSA would become wilderness. The short-term preservation of wilderness values would not continue into the future. Wilderness values, however, would only be minimally impacted.

GILA BOX. In the short term, the wilderness values, would be preserved through the Interim Management Policy. Under the *Proposed Action*, the WSA would not be designated wilderness. In the long term, the natural values of the river canyons would be preserved while the table lands above the river would be managed for other multiple uses with emphasis on livestock forage productivity.

TURTLE MOUNTAIN. In the short term, wilderness values would be maintained through the Interim Management Policy and man's environment would not change. In the long term, wilderness values would be severely impaired if vehicular access to the state inholding were allowed and by construction of livestock facilities within the WSA. Long-term productivity of livestock forage would increase, as would opportunities for motorized access to the WSA for recreation purposes.

JAVELINA PEAK. Short-term preservation of wilderness values would give way to continued ORV use and long-term livestock forage productivity.

PELONCILLO MOUNTAINS. In the short term, wilderness values would be preserved through the IMP. While

The head of Little Doubtful Canyon in Peloncillo Mountains WSA lies in a small open saddle flanked by rock outcrops.

the *Proposed Action* would not designate the WSA as wilderness, no other land uses would occur that would significantly affect long-term productivity.

DOS CABEZAS MOUNTAINS. The short-term preservation of wilderness values would continue into the long term on the 11,998 acres designated wilderness. In Buckeye Canyon, in the western part of the WSA, wilderness values would be lost on 115 acres in the long term due to mineral production.

ENERGY REQUIREMENTS AND CONSERVATION POTENTIAL

Energy use would not differ significantly for any alternative or mitigation measure. No conservation potentials are evident.

Sheer clifflines offer dramatic scenery at higher elevations throughout Fishhooks WSA.

Chapter 5

CONSULTATION

AND

COORDINATION

CHAPTER 5
COORDINATION AND CONSULTATION

Coordination and consultation have been a continuing process beginning in 1978 with the wilderness inventory of BLM lands. The issue identification process for this EIS involved individual contacts with other federal agencies, state agencies, county governments, range users, the public, special interest groups, the District Grazing Advisory Board and the District Advisory Council.

CONSISTENCY

The Federal Land Policy and Management Act requires that BLM plans be as consistent as possible with existing officially adopted and approved resource- related plans of other federal agencies, state agencies, local governments and Indian tribes that may be affected. After extensive consultations, BLM found that no officially approved resource-related plans of state, local or other federal agencies would conflict with wilderness designation of any of the WSAs. Specific recommendations of a resource plan, however, may conflict with wilderness designation. The following is a list of federal agencies, state agencies and local governments consulted.

Apache-Sitgreaves National Forests
Bureau of Indian Affairs, Coolidge, AZ
Bureau of Indian Affairs, San Carlos, AZ
Bureau of Indian Affairs, Phoenix, AZ
Coronado National Forest
Soil Conservation Service, Willcox, AZ
U.S. Geological Survey, Water Resource Division, Thatcher, AZ
Arizona State Land Department
Arizona State Parks Department
Central Arizona Association of Governments (CAAG), Florence, AZ
Cochise County, AZ
Gila County, AZ
Graham County, AZ
Greenlee County, AZ
Southeastern Arizona Governments Organization (SEAGO), Bisbee, AZ
New Mexico State Land Commission
Hidalgo County, NM
City of Bisbee, AZ
City of Douglas, AZ
City of Safford, AZ
City of Willcox, AZ
Coronado Resource Conservation and Development Area Council, Willcox, AZ
Southwestern New Mexico Resource Conservation and Development Area Council, Las Cruces, NM

U.S. Air Force

U.S. Air Force training flights over the WSAs would impact solitude to varying degrees, because the Wilderness Act does not restrict such flights. If overflights become a significant problem in designated wilderness areas, BLM would work with the Air Force to reach mutually agreeable solutions.

States of Arizona and New Mexico

Bureau planning regulations require that the States of Arizona and New Mexico be given an opportunity to review and comment on the consistency of the proposed wilderness recommendations with state plans, programs and policies. In accordance with this requirement, BLM provided the governor of each state a 60-day period to review this document. Neither state found the proposed wilderness recommendations inconsistent with their plans, programs or policies. Specific input provided by the State of New Mexico Natural Resources Department and the Department of Game and Fish was incorporated into the analysis.

San Carlos Apache Tribe

BLM contacted the San Carlos Apache Tribe through its Tribal Council and the Bureau of Indian Affairs concerning possible designation of the WSAs next to the San Carlos Indian Reservation. BLM's wilderness proposals do not conflict with the Tribe's existing land use plans. The Tribe, however, is developing a new plan and has expressed concern that wilderness designation may limit development of Reservation lands.

The Tribe has also expressed concern that designation of Black Rock WSA as wilderness would significantly increase visitor use to the area. Because access to the WSA crosses the Reservation, the Tribe fears increased vandalism, theft of natural resources and trespassing. These concerns are echoed by the local ranchers adjacent to the WSA, who feel the Tribe will close the Black Rock Road where it crosses the Reservation due to increased problems with the public. If the road were closed, the ranchers would have no access to their private property and ranches. As a result of these concerns, BLM requested the Department of Interior Field Solicitor determine if the Tribe could legally close the road. In the Solicitor's opinion, only the Indian Commissioner can close the road under special circumstances such as public safety or fire prevention. The road is available for public use as provided by Section 170.8(a), *Code of Federal Regulations, Title 25*. If visitor use problems do develop, BLM will work with the Tribe to reach mutually agreeable solutions.

BLM also contacted the Tribe with respect to the American Indian Religious Freedom Act to determine if wilderness designation would impact their rights guaranteed under that law. No response was received.

PUBLIC INVOLVEMENT

An active public involvement process aided in developing this EIS. Public comments were gathered through workshops in Safford, Tucson and Globe; personal contacts; news releases; and mailings to agencies, individuals, businesses and other groups on the Safford District wilderness mailing list. The major emphasis of the public involvement process has been to identify issues that the public wants considered in this EIS and the development of alternatives.

Scoping (Issue Identification)

The scoping process began early in the study phase. BLM held a series of public scoping meetings to identify the public's concerns. Other issues were identified from public comments received during the inventory phase and the professional judgements of BLM specialists. Further issues were identified during the public comment period held to review the draft EIS. Scoping thus reduces the length of the EIS by emphsizing important concerns and impacts.

The scoping process for this EIS involved several phases, extending from November 1978 to February 1983:

- Initial wilderness inventory — November 1978 to April 1979.
- Public comment period — April 1979 to June 1979.
- Intensive wilderness inventory — July 1979 to May 1980.
- Public comment period — May 1980 to July 1980.
- Wilderness inventory decisions — November 1980.
- Wilderness study and planning process — November 1981 to February 1983.
- Scoping workshops — December 1981.
- Meeting with Safford District Advisory Council — December 1981.
- Public comment period on preliminary issues and criteria — December 1981 to January 1982.
- Public comment period on preliminary alternatives and EIS issues — June 1982 to July 1982.
- Federal Register Notice of Intent to prepare an EIS — August 1982.
- Meetings with San Carlos Indian Reservation Tribal leaders — August and September 1982.
- Meetings with Bureau of Indian Affairs — September 1982.
- Meetings with interested energy and minerals groups — December 1981 to December 1982.
- Public comment period on the draft wilderness EIS — June 1983 to August 1983.

Issues and Alternatives Identified in the Scoping Process

Issues. The scoping process initially identified the impacts wilderness management would have on all resources BLM manages: livestock grazing, soils, forestry, threatened and endangered plant and animal species, wildlife, cultural resources, watershed, lands and realty, minerals and energy, paleontology, recreation and visual resources. Other topics also identified included topography, climate, air, fire management, economics, social elements and flood control in the upper Gila River watershed. Topography and climate were dropped as issues because wilderness management would have no significant impact on these elements of the EIS area.

Specifically, the following issues were identified by BLM specialists and the public for evaluation in the EIS. Those issues carried forward for analysis are identified in Chapter 1. Those issues dropped from further consideration, and why, are also identified.

- Will the WSA add to the expansion of the ecosystem diversity of the National Wilderness Preservation System — became Issue No. 1.
- How will the public access the wilderness areas — this issue was not carried forward as it was outside the scope of the EIS. This issue dealt with access to a wilderness, not within it. Access to a wilderness will be addressed in the development of the wilderness management plan that follows designation.
- How will minerals, oil and gas and geothermal resources be affected by wilderness — became Issue No. 6.
- How will ORV use be affected by wilderness — became part of Issue No. 10.
- Will wilderness designation impact livestock numbers and construction and maintenance of facilities — became Issue No. 7.
- How will wilderness designation impact construction of flood control structures in the upper Gila River watershed — this became issue No. 5, but was not analyzed because no dam is expected to be built in the Gila Box WSA. The Camelsback site is not being considered by the Bureau of Reclamation for water storage purposes and while the Corps of Engineers is considering it as a possible flood control site, it is not their preferred alternative. Ultimately Congress will review this wilderness study and the flood control/water supply study and make the decision concerning the wilderness designation or a dam.
- What are the economic impacts of wilderness designation — a variety of economic issues became Issue No. 4.
- What impact will wilderness have on a variety of wildlife issues (ecosystems, hunting, hunter access, habitat improvement, T&E species, riparian habitat and riparian habitat improvement) — ecosystems became part of Issue No. 1; hunting

and hunter access became part of Issue No. 10; T and E species became part of Issue No. 8; and habitat improvements, riparian habitat and riparian habitat improvement became Issue No. 9.

- How will wilderness impact watershed values including soil, water and vegetation — water became Issue No. 16 and vegetation became Issue No. 11. Soil was not carried forward because the interdisciplinary team determined neither wilderness nor nonwilderness designation would significantly affect this resource.
- How will wilderness impact access to private and state inholdings and state mineral estate (subsurface) and utility corridors — access to inholdings and mineral estate became Issue No. 20 and utility corridors became Issue No. 17.
- How will wilderness impact air quality — became Issue No. 15.
- What impact will wilderness have on fire management (suppression and prescribed burning) — this issue was not carried forward because normal fire suppression methods employed in Safford District do not involve heavy equipment and are minimally impairing. Therefore, management of areas as wilderness or non-wilderness would not create different levels of impacts.
- How will outside sights and sounds affect the wilderness quality of the WSAs — became Issue No. 2.
- Can the recommended wilderness areas be managed to preserve their wilderness qualities — became Issue No. 3.
- How will wilderness designation affect cultural and paleontological resources — cultural resources became Issue No. 12 and paleontological resources became Issue No. 13.
- Will wilderness designation of Black Rock WSA cause the San Carlos Apache Tribe to close the Black Rock road across the Reservation — became Issue No. 21.
- How will wilderness affect management of visual (scenery) resources —became Issue No. 14.
- How will wilderness designation affect Air Force training flights over the WSAs — became Issue No. 19.
- How will the wilderness study address recommendations for wild, scenic or recreational river designations on the Gila and San Francisco Rivers — became Issue No. 18.
- How will wilderness impact outdoor recreation — became part of Issue No. 10.
- How will wilderness designation impact T and E plants — became part of Issue No. 11.

Chapter 1 identifies the environmental issues selected for analysis in the EIS.

Alternatives. The *All Wilderness* and *No Wilderness (No Action)* alternatives, identified through scoping and evaluated in the planning process, were carried forward for analysis in the EIS. The evaluation in the Management Situation Analysis (see Chapter 1) lead to the development of several partial wilderness alternatives for each WSA. These individual WSA alternatives were then grouped to develop a full range of alternatives for the EIS area (all nine WSAs), from which the preferred alternative was chosen.

This process resulted in three partial wilderness alternatives, in addition to *All Wilderness* and *No Wilderness*, for analysis in the EIS. An attempt was made to develop a fourth partial wilderness alternative but it was so similar to another alternative that it was not carried into the analysis. These five alternatives provide the public and the decisionmaker with a full range of options from which to select a preferred alternative.

Public Comment

BLM requested comments on the draft EIS from all affected grazing permittees, interested individuals and the following agencies and interested groups. There were 950 copies of the draft EIS distributed to federal, state and local government agencies, organizations and individuals for review and comment.

FEDERAL AGENCIES

Advisory Council on Historic Preservation
Department of Agriculture
  Forest Service
  Soil Conservation Service
Department of Defense
  Army Corps of Engineers
  United States Air Force
Department of Energy
Department of the Interior
  Bureau of Indian Affairs
  Bureau of Land Management, NM
  Bureau of Mines
  Bureau of Reclamation
  Fish and Wildlife Service
  Geological Survey
  National Park Service
Department of Transportation
Environmental Protection Agency
Federal Energy Regulatory Commission

ARIZONA ELECTED OFFICIALS

Federal

Senator Dennis DeConcini
Senator Barry Goldwater
Representative John McCain
Representative Jim McNulty
Representative Eldon Rudd
Representative Robert Stump
Representative Morris K. Udall

State

Governor Bruce Babbitt
Senator A.V. "Bill" Hardt
Senator Ed C. Sawyer
Representative Edward G. Guerrero
Representative Joe Lane
Representative E.C. "Polly" Rosenbaum

NEW MEXICO ELECTED OFFICIALS

Federal

Senator Jeff Bingaman
Senator Pete D. Domenici
Representative Joe Skeen

State

Governor Toney Anaya

ARIZONA STATE AGENCIES

Arizona Agriculture and Horticulture Commission
Arizona Department of Mineral Resources
Arizona Department of Transportation
Arizona Department of Water Resources
Arizona Game and Fish Department
Arizona Indian Affairs Commission
Arizona Office of Arid Land Studies
Arizona Office of Economic Planning and Development
Arizona Office of Tourism
Arizona Outdoor Recreation Coordinating Commission
Arizona State Clearinghouse
Arizona State Historic Preservation Officer
Arizona State Land Department
Arizona State Museum
Arizona State Oil and Gas Commission
Arizona State Parks
Arizona State University
Commission on Arizona Environment
Museum of Northern Arizona
University of Arizona

NEW MEXICO AGENCIES

New Mexico Bureau of Mines and Mineral Resources
New Mexico Department of Agriculture
New Mexico Department of Finance and Administration
New Mexico Department of Game and Fish
New Mexico Health and Environmental Department
New Mexico Highway Department
New Mexico Natural Resources Department
New Mexico State Historic Preservation Officer
New Mexico State Land Commission

ARIZONA COUNTY/LOCAL AGENCIES

Central Arizona Association of Governments
Chairman, San Carlos Apache Indian Tribe
Cochise County Board of Supervisors
Gila County Board of Supervisors
Graham County Board of Supervisors
Greenlee County Board of Supervisors
Southeastern Arizona Governments Organization
Mayor of Benson
Mayor of Clifton
Mayor of Duncan
Mayor of Globe
Mayor of Hayden
Mayor of Pima
Mayor of Safford
Mayor of Thatcher
Mayor of Willcox
Mayor of Winkelman

NEW MEXICO COUNTY/LOCAL AGENCIES

Hidalgo County Commissioners
Mayor of Deming
Mayor of Lordsburg
Mayor of Virden

OTHER ORGANIZATIONS

American Mining Congress
American Wilderness Alliance
Arizona Association of 4-Wheel Drive Clubs
Arizona Cattle Growers Association
Arizona Desert Bighorn Sheep Society
Arizona Desert Racing Association
Arizona Mining Association
Arizona Small Mine Operators Association
Arizona Wildlife Federation
Arizonans for Wild and Scenic Rivers
Coronado Resource Conservation and Development Area Council
Defenders of Wildlife
Friends of the Earth
Izaak Walton League of America
League of Women Voters
Mining and Oil Companies
National Audubon Society
National Council of Public Land Users
National Parks and Conservation Association
National Public Lands Task Force
Natural Resources Defense Council
New Mexico Natural History Institute
Safford District Grazing Advisory Board
Safford District Public Lands Advisory Council
Sierra Club
Southern Arizona Hiking Club
Southwest Environmental Service
Southwestern New Mexico Resource Conservation and Development Area Council
The Nature Conservancy
The Wilderness Society
Tucson Gem and Mineral Society
Tucson Rod and Gun Club
Upper Gila River Association
Wildlife Management Institute
Wildlife Society

INDIVIDUALS

BLM also requested comments on the draft EIS from 832 individuals. A complete mailing list is available for inspection at the Safford District Office.

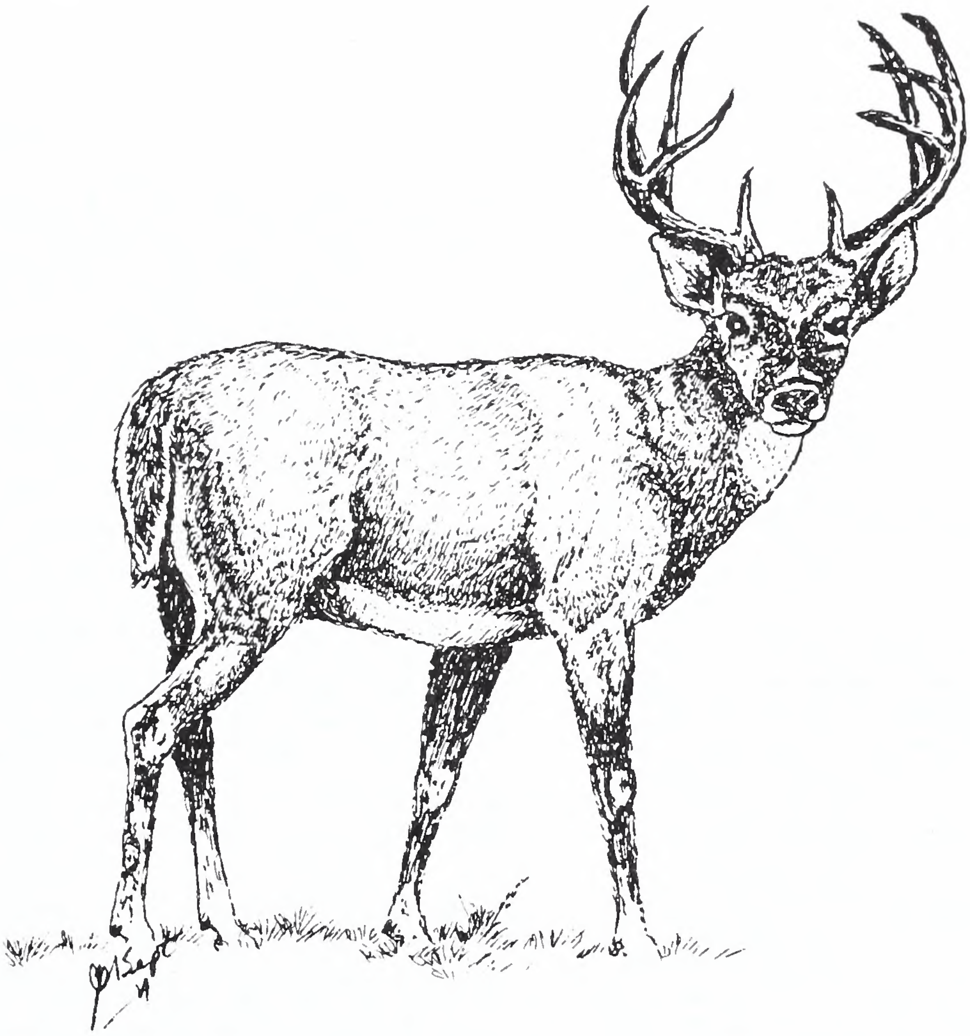
LIST OF PREPARERS

Bureau of Land Management
Safford District, Arizona

Name	Position	Education	Experience	Area of Responsibility
Robert Abbey	Assistant DM for Resources	B.S. Resource Management, Univ. of Southern Miss.	7 yrs. BLM 2 yrs. Army Corps of Engineers 5 yrs. Miss. State Parks	Wilderness Coordination/Outdoor Recreation/Visual Resources
Al Alvarez	Fire Management Officer	B.S. Animal Science, Univ. of Ariz.	11 yrs. BLM	Fire Management
Bill Brandau	Supervisory Range Conservationist	B.S. Recreation and Parks, M.S. Range Management Texas A&M Univ.	10½ yrs. BLM	Livestock Management
Jane Closson	Writer-Editor, Arizona State Office	B.S. Business Administration, M.A. Psychology, Calif. State Univ. at Long Beach	8 yrs. BLM	Editorial/Printing
Jerry Coolidge	Community Planner	B.S. & M.S. Botany, Univ. of Idaho	16 yrs. BLM	Socio-economic Analysis/Environmental Coordination
Jim Currivan	Wilderness Specialist	B.S., Humboldt State	16 yrs. BLM	Wilderness Coordination
Olga Diaz	Editorial Clerk	3 yrs. college	10 yrs. BLM	Clerical
Clarence Hougland	Realty Specialist	B.S. Recreation/Land Management, Northern Ariz. Univ.	14 yrs. BLM	Lands/Realty
Larry Humphrey	Natural Resource Specialist	B.S. Animal Science and Soil Science, Univ. of Ariz.	12½ yrs. BLM 3 yrs. Soil Conservation Service	Vegetation/Threatened and Endangered Plants
Gay Kinkade	Archaeologist	B.S. History, Fort Lewis College, Colo.; M.A. Anthropology, Eastern N. Mex. Univ.	11½ yrs. BLM	Cultural Resources/Paleontology
Steve Knox	Outdoor Recreation Planner	B.S. Watershed Management, Univ. of Ariz.	11 yrs. BLM	Team Leader
Ron Loomis	Mining Engineer	B.S. Mining Engineering, Univ. of Ariz.	11 yrs. BLM	Energy/Minerals
Judy McDonald	Lead Cartographic Technician, Arizona State Office	2½ yrs. Univ. of Md., International Institute of Interior Design	8½ yrs. BLM 4½ yrs. Dept. of Defense	Map Preparation
Ted McRae	Supervisory Range Conservationist	B.S. Range Management, Univ. of AZ	14 yrs. BLM 2 yrs. Forest Service	Livestock Management
Ken Mahoney	Outdoor Recreation Planner	B.S. Park Planning/Resource Management, Univ. of Utah	9 yrs. BLM	Recreation/Visual Resources/Wilderness
Delbert Molitor	Hydrologist	B.S. Range/Watershed, Utah State Univ.	9 yrs. BLM	Air/Water Resources
Louisa Othon	Information Receptionist	1 yr. college	6 yrs. BLM	Clerical
Bob Parker	Wildlife Biologist	B.S. Wildlife Management, Humboldt State Univ., Calif.	9½ yrs. BLM	Wildlife

Keith Pearson	Planner, Arizona State Office	B.A. History, Augustana College, Ill.; M.A. Anthropology, Univ. of Ariz.; Ph.D. Social Anthropology Univ. of Ariz.	10 yrs. BLM 7 yrs. teaching in Arizona universities	Social Elements
Sandy Phillips	Mail/File Clerk	A.A.S., Eastern Ariz. College	8 yrs. BLM	Filing/Information Dissemination
Stephen J. Reynolds	Geologist, Arizona Bureau of Geology and Mineral Technology (ABGMT)	B.S. Geology, Univ. of Texas at El Paso; M.S. Geology, Univ. of Ariz; Ph.D. Geology, Univ. of Ariz.	6 yrs. ABGMT 2 yrs. industry	Geology/Mineral Data
Mike Rucks	Wildlife Biologist	B.S. Zoology, Univ. of Calif., Berkley; M.A. Physical Anthropology Penn. State Univ.	8½ yrs. BLM	Wildlife
Jack Sept	Public Affairs Officer	B.A. History/Science/Art, Univ. of Mont.	11 yrs. BLM 6 yrs. teaching	Public Affairs
Irene Silva	Mail/File Clerk	A.A., Eastern Ariz. College	4 yrs. BLM	Clerical
Stan Wagner	Environmental Coordinator, Arizona State Office	B.S. Forest Management, State Univ. of New York	27 yrs. BLM 2½ yrs. forest research	Environmental Coordination
Marvin Weiss	Regional Economist, Arizona State Office	B.S. Agronomy, Univ. of Wyoming; Graduate work, Economics, Univ. of Wyoming and Univ. of Colo.	11 yrs. BLM 18 yrs. Bureau of Reclamation	Economics
Pete Zwaneveld	Outdoor Recreation Planner	B.S. Outdoor Recreation, Utah State Univ.	8½ yrs. BLM 1/2 yr. National Park Service	Recreation/Visual Resources/Wilderness

Source: Safford District Files



COMMENTS AND RESPONSES

COMMENTS AND RESPONSES

Review Process

The draft EIS was filed with the Environmental Protection Agency and BLM's Notice of Availability of the draft EIS was published in the *Federal Register* on May 27, 1983. The comment period ended August 31, 1983.

There were 950 copies of the draft EIS distributed to federal, state and local government agencies, businesses, organizations and individuals for review and comment. News releases were issued identifying the review period, when and where public hearings would be held and how to obtain copies of the draft EIS.

Public hearings were held in Safford, Tucson and Phoenix, Arizona on July 18, 20, and 21, 1983, respectively, and in Lordsburg, New Mexico on July 19, 1983. The hearings were held to receive oral and written testimony on the draft EIS. Three people testified in Safford, none in Lordsburg, 17 in Tucson, and 11 in Phoenix. Two hundred and sixty-nine pieces of input were received from various agencies, organizations, businesses and individuals.

BLM wishes to thank all of those people who commented on the draft EIS. The time and effort taken to prepare these comments is appreciated.

The EIS team reviewed all comments and responded to those presenting new data, questioning the analysis or raising issues relating to the EIS. All comments were considered by BLM in making wilderness suitability recommendations for the Safford District wilderness EIS area.

This final EIS, which includes the written comments and hearing transcripts, was reviewed and approved by the Secretary of the Interior before being filed with the Environmental Protection Agency and released to the public.

Copies may be obtained and inspected at the following BLM Offices: Safford District Office, Safford, Arizona; Arizona State Office, Phoenix, Arizona; and Washington Office of Public Affairs, Washington, D.C.

Written Comments

The following agencies, organizations, businesses, and individuals submitted comments on the draft EIS. Many identical letters and petitions were received but have not been reproduced in this document. A sample of each letter or petition has been included. The commentors have been listed below in the order they were received. The numbers listed indicate those comments reproduced in this document. The asterisks represent the letters with written responses. BLM's responses to the comments follow each letter.

BLM wishes to thank those who took the time to review and comment on the draft EIS.

Letter No.	Name
*1	John H. Pamperin
*2	Enid C. Howard
*3	Arizona State Oil and Gas Commission
*4	Graham County Board of Supervisors
5	Charles M. Bagley
6	Reed Secord
7	Sierra Club, Grand Canyon Chapter, Arizona
8	Conoco, Inc.
*9	Richard Wyndham
*10	Carol S. Kestler
*11	Enid C. Howard
*12	American Rivers Conservation Council
*13	Harry Melts
*14	Bill Watt
*15	Nicholas Van Pelt
*16	Lloyd and JoDean Glover
*17	Arizona State Clearinghouse
*18	New Mexico Department of Game and Fish
*19	Bruce K. Thompson
*20	Gayle Hartmann
21	Dan Fischer
22	Forest Service — Region 3
23	Edward Parrish
*24	Gail B. Robinson and E.B. Robinson, Jr.
*25	Department of the Air Force
26	David Moon
*27	Sharon F. Urban
*28	Army Corps of Engineers
*29	Jack L. Jarvis
*30	Ruskin Lines
*31	Ed Grumbine
	Arizona State Clearinghouse
*32	Duval Corporation
33	Elizabeth Abbey
*34	James E. Posedly
35	Rudolf Dankwort
*36	Walter and Dorothy Pelech
37	Roger Southwick
38	Joe Alder
	W.B. Mattice
39	Fred Baker
	Cole Webb
	Alan Day
40	Atlantic Richfield Company
*41	Wendy E. Thon
*42	Southern California Edison Company
*43	St. Gregory High School
44	R.H. Johnson
*45	Maureen Mageau —Decindis
46	Harry Melts
*47	Jim Vaaler
	Bazy Tankersley
	Robert Sproul
	Joe Lamb
48	Ed Schechner

49 U.S. Department of Transportation
*50 Allen T. Cooper
*51 Dan Hofstadter
52 Karl Lundberg
53 Dan S. Leeth
Lisa Tucker
54 Roy Tucker
55 Mrs. George E. Oler
*56 Kris Johnson
57 Charles Urban
*58 Minerals Exploration Coalition
*59 Arizona Game and Fish Department
*60 Wildlife Management Institute
*61 Bureau of Mines
62 Fred Liddle
63 Karen Arrowwood
*64 Liz Wise
*65 Deborah Welsch
*66 Marie Anita Burling
*67 Arizonans for Quality Environment
*68 Jim Notestine
*69 Lee Oler
70 Stephen Bell
71 E.M. Schern
*72 W. Keirn Roach
*73 Anne M. Murry
Jefferson Z. Rogers
Joan B. Rogers
Jonathan Rogers
74 Doris Beilmann
75 Sidney Hirsh
76 Sally Whitcher
*77 George E. Campbell
*78 Jeanne Williams
*79 S. Lee Spencer
80 Marc S. Walter
*81 Debbie Kornmiller
82 Upper Gila River Association
83 Tucson Rough Riders
*84 Christina Neal
*85 L.E. Moore, Jr.
*86 L.E. Moore, Jr.
Terry McEuen
*87 Volley and Chloe Dryden and Franklin Holladay — Petition
*88 Nelson Collamer Foundation, Inc.
*89 Richard Carter
90 Randa and Ray Bennett
91 Mr. and Mrs. John Wayne Lines
92 Safford-Graham County Chamber of Commerce
93 Emil Crockett Agency, Inc.
*94 Adam Klein
*95 Patricia Schmidt
*96 Fish and Wildlife Service
*97 Arizona Mining Association
*98 Arizona Bureau of Geology and Mineral Technology
*99 Allen T. Cooper
*100 Arizonans for Wild and Scenic Rivers
*101 Thoron Lane
*102 National Public Lands Task Force
103 Doris Woods
*104 Sally F. Hoyt
105 Franklin Irrigation District
106 Theodore L. Cogut
107 Jimmie L. Gullion
108 Greenlee County Board of Supervisors
*109 Justin Schmidt
110 Barbara Conrad
111 Paul W. Huddy
112 Gene I. Wendt
*113 Phelps Dodge Corporation
*114 Graham County Board of Supervisors
115 Graham County Board of Supervisors
116 Ellen Calabro
*117 Norma B. Carlson
*118 Mary E. Cosaboom
*119 H.J. Turin
120 Defenders of Wildlife
121 Eugene R. Etter
122 Walter R. Spofford
123 C.M. Clark
124 John Pamperin
*125 Sandra Pederson
126 Ethel W. Thorniley
127 Citizens of Greenlee County — Petition
128 Keith H.E. and Ester Larson
*129 Upper Gila River Association
L.E. Moore, Jr.
130 Huachuca Audubon Society
*131 Drew Crook
132 Governor's Rangeland Advisory Council
*133 Sierra Club Legal Defense Fund, Inc.
Edwina N. Gray
Susan Franco
V. Andazola
Clarice Holder
Jim Fernandez
Johnnie Owens
Bill (last name not legible)
Aaron L. Cole
Mrs. Pat Milligan
L. Sue Jennings
Rowan Williams
Chester Kiehne
O. Kiehne
Adriane G. Blale
Jesse E. Hoyt
Dwane Reece
Velma Willis
Margaret Joyce Brown
Steve Farrell
Pearl Willis
Susan Fernandez
Robert Gomez
G. Ruiz
Robert S. Goodwin, Jr.
Stella Hughes
Manuel Perea
Josephine Bearden
Mike Bearden
Cynthia Bearden
Lydia G. Martinez
Pauline Coleman
Ramona Downs
Isabel Fernandez

Leena Udall
R.H. Traynor
Randall Florez
Mary Rodriguez
Amy McCullar
Mary I. Jimenez
Beverly Franco
Rex Schurtz
*134 United Four Wheel Drive Association
135 Gila Valley Natural Resource Conservation District
*136 The Holladay and Dryden Family
*137 Sierra Club, Grand Canyon Chapter, Arizona
*138 Sierra Club, Grand Canyon Chapter, Arizona
Mrs. William Fischler
B. Jay Bishop
Jerry Crader
Robert Bishop
Ray Kunde
Jose Cueto
*139 Lloyd L. and JoDean Glover
Mona L. Downs
Mary Ann Strong
Raymond Howard
Maud Etta Gatlin
Nanda Gomez
Georgia Klumker
(Illegible name from Clifton, AZ)
Ruth Ruiz
Joe B. Cannon
Martha Stacy
Bill (last name illegible)
Frank Fowler
Fred Fritz
Katharine Lee
Kimbal Coleman
Lola Johnson
Virginia C. Smith
Christie Menges
Arthur Wright
Teofila Cueto
Jeff Menges
Brian G. Jennings
Kenyon Udall
James E. Davis
Debra Jennings
Jim Grammer
R.L. Strong
Norma King
Herschel Downs
Herbert Stacy
Kelly Klumker
Justin Marks
Robert Foxworth, Jr.
Elaine Marks
Lynn Anderson
O.B. Willis
Edward K. Stacey
Stella Hughes
Helen Reece
Angel R. Cueto
Jewell Goodwin
Olive McEuen
Elizabeth Tea Angle
Jerry (last name illegible)
Floyd Gatlin
William Coffeen
Abelardo Martinez
Lillie B. Stacy
Keith Cannon
Daisy Mae Cannon
Lydia G. Martinez
Howard (last name illegible)
Bradford Johnson
140 Marshall Steed
141 Institute for Raptor Studies
Cy Gomez
*142 Kay Adams
Citizens of Greenlee County Petition
Jim Wilbourn
*143 Environmental Protection Agency
144 John R. Swanson
*145 Department of Air Force
146 J.N. McEuen
*147 Jerry W. Hancock
148 Jo Marie Hinton
Citizens of Graham County — Petition
149 Federal Energy Regulatory Commission
*150 Yuma Audubon Society
*151 Bureau of Reclamation

1

Dear Mr. Bibles,

I am writing to you in regards to your recent BLM trip to the Gila River Box Canyon area.

The article in the Az. Republic gave the impression that the BLM did not deem the area worth saving for a wilderness area.

1-1 Just because the area is a dry river bed 99% of the time doesn't mean it's not of some value.

1-2 As an ORV owner, I am glad that mos places are open to public access, but I am just as glad that there are places tha are closed to traffic. We can't destroy fragile ecosystems just to satisfy the whim of some uncaring types.

Please give some consideration to our desert and think about the consequences of a bad decision about this vital area

Thank you

John Pamperi

RESPONSE — LETTER 1

1-1 The Gila River is classed as a perennial stream which means that water flows at varying levels year round.

1-2 Many of the features of the Gila and San Francisco River canyons that attract the floatboater or hiker also attract the ORV user. The water, riparian vegetation, and scenery attract both groups of recreationists. Many persons commented on the resource damage that would result from opening the river canyons to ORV use. ORV use, however, has occurred in the canyons since the 1950s. Though ORV use has the potential to adversely impact a variety of resources, these impacts are not significant in the Gila Box. ORVs are generally found in the streambed where the evidence of their presence is removed by the next high-water flow. The roar of a sandbuggy echoing in the canyon will disrupt the solitude that hikers, backpackers, birdwatchers or horseback riders hope to experience. Depending on the individual, the impact will be short-term, lasting only while the buggy passes by, or the noise may ruin a person's entire trip. Different people will react differently to the impact. The noise of ORVs could also impact wildlife such as nesting birds. BLM will continue to monitor the use in its normal day-to-day operations to identify impacts on other resources of the WSA.

2

May 8, 1983

Les Rosenkrance
BLM Safford District
425 E. 4th Street
Safford, AZ 85546

Sir:

It has recently come to my attention that you are opposing the Arizona Wilderness Coalition in their efforts to establish wilderness status for some specific areas along the Gila River, Southern Arizona's only major riparian waterway. (and its tributaties.)

How can you concientiously support multiple use for those areas when you know very well that it will destroy and denude the desert land of the fragile ecosystem it must have to survive the impact of man and his so called improvements.

We who live in Southern Arizona do not want to see our desert become another impoverished, overgrazed, overused, over-drained of water, (both river and ground water) exhausted dust-bowl.

Every study that has been made of the watersystems of Arizona points out that there is not enough surface or ground water to support a large population in our desert. This applies to the Gila and its tributaries because it is seasonal. I cite the recent drought when the San Carlos Reservoir was practically empty and a pool of mud.

Where I live we note that the exodus is already beginning from Phoenix and Tucson because water has become a major financial burden to citizens and they want to escape the restriction and expense. Their ground water is polluted and the Colorado River will not be able to supply their needs indefinately. Our own ground water supply here in Sulpher Springs Valley will be in serious trouble because of overpumping by ranchers who are into producing large acreage of Alfalfa, corn, milo, etc. Long time valley residents have had to deepen their wells (household water) twice.

2-1 The specific area that I am concerned about in Southern Arizona is the Gila Box-Eagle Creek unit because so far it has not felt the impact of man to the extent that it shows complete degrading. If action is taken now to establish it as a wilderness area, the canyon would retain its wild riparian habitat and continue to provide a breeding shelter for the endangered species that nest and live there at the present time.

2-2 If this specific area: Gila Box-Eagle Creek, Unit No. 4-22/23/24 was given such an enthusiastic recommendation in the BLM Intensive Inventory why has its status been changed to be dropped from the prime BLM list of candidates for Wilderness protection? I want to know!

You see Sir, the public does note situations that endanger the very important items of their environment.

I am asking you specifically to extend Wilderness protection to the Gila and its watershed, by recommending it to our State Representatives so that it can be voted into law.

We who live in Southern Arizona just don't have much in the way of rivers, we need to treasure what we have.

Sincerely,

Enid C. Howard
P.O. Box 505
Pearce, AZ 85625

Enid C. Howard

RESPONSE — LETTER 2

2-1 Eagle Creek is not included in the WSA. It is private land.

2-2 BLM Intensive Inventory Unit AZ-4-22/23/24(A) was recommended for WSA status because it has the required wilderness characteristics: size; naturalness; and outstanding opportunities for solitude and primitive unconfined recreation. However, it was not recommended for wilderness designation because of conflicts with existing ORV use and potential mineral and geothermal energy uses. The wilderness values of the area can be managed without eliminating opportunities for other uses.

3

Form 1541–3
(July 1965)
(formerly 4–1599 a)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

CONFIRMATION/REPORT OF TELEPHONE CONVERSATION

TO	Name	Ron Loomis	FROM	Name	AK Doss
	Office	BLM		Office	AZ State O&G Commission
	Location	Safford		Location	Phoenix
	Telephone Number	428-4040		Telephone Number	255-5161

Purpose of Call:

3-1 To inquire about the well drilled in 1927 near the Javelina Peak WSA in Section 36, T. 10S., R. 28E. The state commission has the log of this well, furnished by a Bob Thomas of Globe, AZ. According to the log, the Whitlock State #1 was drilled to 1925' and abandoned in 1927. Although fresh artesian water was logged at 1080' there was no mention in the log of any showing of oil.

Explanatory Remarks:

6/1/83
(Date)

R H Loomis
(Signature)

CONFIRMATION COPY

RESPONSE — LETTER 3

3-1 This data has been incorporated into EIS.

4

GRAHAM COUNTY BOARD OF SUPERVISORS
GRAHAM COUNTY COURTHOUSE · 800 MAIN STREET · PHONE 428-3250
SAFFORD, ARIZONA 85546

SUPERVISORS
DR. HUGH HAMMAN, CHAIRMAN
DELBERT HOUSEHOLDER, MEMBER
DALE OLSEN, MEMBER

H. C. GIETZ, COUNTY MANAGER
BARBARA FELIX, CLERK

June 2, 1983

Lester Rosenkrance
Safford District Manager
Bureau of Land Management
Safford District
425 E. 4th St.
Safford, Arizona 85546

RE: Draft Wilderness Environmental Impact Statement

Dear Mr. Rosenkrance:

The Graham County Board of Supervisors feel it is absolutely necessary to allow the continuation of the study by the Army Corps of Engineers on the feasibility of the construction of Camelsback Dam within the boundaries of the Gila Box area.

4-1 Over the past several years the local, state and federal governments have spent millions of dollars in restoration of facilities due to uncontrolled waters on the Gila and San Francisco Rivers. This is not counting the millions of dollars in private agriculture losses. We feel this by itself is just reason to withhold any consideration of wilderness designation in this area.

4-2 Another reason we feel the Gila Box area shouldn't be designated as wilderness is the problems that BLM would have in controlling the area such as regularly patrolling the waterways, especially during low water times. We feel it would be economically impossible to do a good job in sustaining a controlled environment in this area.

We believe the environment would change only slightly in this area without wilderness designation because of the ruggedness and inaccessibility of the area.

We would appreciate being informed on any subject having to do with the Gila Box area.

Sincerely,

GRAHAM COUNTY BOARD OF SUPERVISORS

Hugh G. Hamman, Chairman

HGH:bf

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

RESPONSE — LETTER 4

4-1 The Camelsback Dam will not be analyzed in this EIS. The dam was authorized for construction in 1962 but funding has never been appropriated. The Bureau of Reclamation (BuRec) and the Corps of Engineers (COE) are examining possible water supply and flood control needs of the Upper Gila River Watershed in eastern Arizona and western New Mexico. In recent discussions, BuRec has indicated that they do not regard Camelsback Dam as an alternative because the geologic structure of the dam site has poor retention qualities (seepage). In addition, BuRec has found that the size of the dam must be limited so the reservoir would not flood the town of Clifton. The life of the project, therefore, is shortened because the smaller pool area will fill in faster with sediment than if the dam and reservoir could have been larger. The COE has included the Camelsback Dam as an alternative in their flood control study but in discussion with them, they indicate it is not their preferred alternative because the benefits do not appear to justify the cost. The COE will make their final recommendation in September 1987. For these reasons, implementation is unlikely and this analysis assumes Camelsback Dam will not be built.

The environmental impacts of dam construction are not being overlooked. The COE is analyzing the impacts of their flood control alternatives. Congress will have both the COE study and the BLM wilderness study to review and consider in reaching a decision about wilderness designation or a dam.

4-2 Assumption 11 was made that BLM would have adequate funding to implement any of the alternatives.

5

CHARLES M. BAGLEY, JR., M.D.
ROBERT F. LANE, M.D.
INTERNAL MEDICINE, HEMATOLOGY & ONCOLOGY

801 Broadway, Suite 725
Seattle, Washington 98122
(206) 682-5040

1530 North 115th, Suite 303
Seattle, Washington 98133
(206) 365-8252

June 6, 1983

Lester K. Rosenkrance, District Manager
Bureau of Land Management
425 East Fourth Street
Safford, Arizona 85546

Re: Draft EIS for Wilderness
Study Areas

Dear Mr. Rosenkrance:

Thank you for the Safford Draft WFAEIF. Having studied this document, I thoroughly concur that the areas you have designated for proposed wilderness certainly merit that designation richly.

Thank you again for such a thorough analysis.

Sincerely,

Charles M. Bagley, Jr., M.D.

210/14

6

2221 NE 53rd Street
Lighthouse Point, Florida 33064
June 8, 1983

District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

Regarding the Safford District Draft Wilderness Environmental Impact Statement, I support the designation of nine wildernesses totaling 131,820 acres. I support the All Wilderness Alternative outlined in the Statement. It is important that this remaining wilderness be preserved for its wildlife, scenic, and recreational values.

Sincerely,

Reed Secord
Reed Secord

7

SIERRA CLUB
Grand Canyon Chapter Arizona

RECEIVED
JUN 13 1983
SAFFORD DISTRICT

6/3/83

Mr. Lester Rosenkrance
Safford District Manager
425 E. 4th Street
Safford, Az. 85546

Dear Mr. Rosenkrance,

The Grand Canyon Chapter of the Sierra Club met recently and discussed issues concerning the Gila Box. We have been deeply involved in the land management planning of this area for at least a decade and perceive a significant climax in important issues upcoming.

The Chapter will present a detailed analysis of and comment to the Safford District Draft Wilderness E.I.S. later in the summer. For now, we would like to present you with four resolutions which we adopted during our last Executive committee meeting. Please accept these resolutions as part of our official comment to the D.E.I.S. and view them as an official chapter stand on the Gila Box area.

Be it resolved:

1) The Chapter reaffirms its long standing opposition to the construction of camelback dam.

2) The Chapter opposes construction of the Quail Springs and Conner dams on the San Francisco and Gila rivers upstream from the Gila Box. The Chapter also recommends that the Rio Grande Chapter of the Sierra Club adopt a similar resolution.

3) The Chapter supports a 17,831 acre Gila Box wilderness. (Includes appeal area won in I.B.L.A. suit by the Sierra Club Legal Defense Fund.)

4) The Chapter supports reduction of cattle grazing in the riparian habitats of the Gila Box and Bonita creek to allow the restoration of degraded wildlife habitat due to overgrazing. The Chapter further supports the recommendations by the Arizona State Game and Fish Dept. concerning fencing in Bonita creek and other wildlife habitat management activities in both Bonita

creek and the Gila Box. This is in reference to a joint B.L.M. Az. Game and Fish Gila Peloncillo Habitat Management Plan approved by Bud Bristow 4/2/82 and by Les Rosenkrance 12/10/81, and subsequently overruled by the B.L.M. It is our understanding that this unfortunate decision to renig on an approved Plan was influenced by the district's grazing advisory board. Due to the significance of the overturning of this Habitat Management Plan in a significantly overgrazed area we would appreciate a timely response with an explanation of this action.

Thank-you very much for your time and consideration.

Sincerely,

Paul Hirt

cc: Dean Bibles
Mo Udall
Jim McNulty
Bud Bristow
John McCain

8

conoco

E. Fred Birdsall
Public Lands Coordinator

Conoco Inc.
555 17th Street
Denver, CO 80202
(303) 575-6123

June 16, 1983

L. K. Rosenkrance
District Manager
BLM
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

I concur with the proposed action/preferred alternative of the Safford District Wilderness EIS. I am sorry I have nothing additional to offer, but your DEIS is complete and the rationale supporting the preferred/proposed alternative is well-documented.

Yours very truly,

E. Fred Birdsall
E. Fred Birdsall

jil

9

17 June

Dear Sir:

Thank you for recently sending me a copy of the Safford District draft EIS for WSA's. I disagree with your proposed alternatives in three areas:

9-1 Gila Box. The all wilderness alternative is preferable. Please keep ORVs out of this area; They have enough of the southwest as it is. My wife and I own a Jeep and use it often; we also recognize, however, that ORVs cannot be allowed unrestricted access to all areas. Your statement on p. 60 that ORV use would be "slightly to moderately impacting opportunities for solitude" is rather grossly inaccurate. ORV use in an area drastically impacts opportunity for solitude.

9-2 Javelina Peak. As above, please go with the all wilderness alternative. Keep ORV use out of this area, and you will significantly reduce the likelihood of future vandalism of the fossil resource areas.

9-3 Peloncillo Mts. Again, the all wilderness alternative should be chosen. The fact that irregular boundaries are perceived as more difficult to enforce should not be used as a reason not to protect this area.

Thank you.

Sincerely yours,

Richard Wyndham

Richard Wyndham
P. O. Box 9134
Albuquerque, NM 87119

RESPONSE — LETTER 9

9-1 While ORV users have most of the District in which to recreate, this statement also applies to the non-motorized recreationist. The attractiveness and desirability of the river canyons attracts both types of recreation users. ORV use would shift to other nearby areas if forced to. We will, however, manage the ORV use to continue in the canyons without significant adverse impact to soils, vegetation, primitive recreation, wildlife, water or other uses. If necessary, ORV use can be restricted to prevent degradation of resource values. See also Response 1-2.

9-2 Most of the ORV use in the Javelina Peak area occurs in the southern part of the WSA around Hot Well. Additional ORV use is south of and outside the WSA because most of the dunes are outside the WSA. The current level of ORV use within the WSA is not significantly affecting the fossil resources. Increased ORV use could be detrimental to the known fossil site but BLM will control the use should adverse effects become apparent. Wilderness designation would protect the known fossil resources of the WSA (no ORV use) but nondesignation would not significantly affect the fossil remains.

9-3 The Wilderness Study Policy (BLM 1982c) states that an area recommended suitable for wilderness designation must be capable of being effectively managed to preserve its wilderness character. The intent of this criterion is to ensure those areas recommended suitable for wilderness designation can be managed in a manner which enables the entire area designated to maintain its wilderness character in the long term. The BLM must be reasonably certain that the area can be managed as wilderness over the long run. In making this determination, the study policy states the land status of the WSA must be considered in determining the manageability of an area as wilderness. The extent to which private inholdings, state lands, valid existing rights, valid mining claims, mineral leases, rights-of-ways and the overall pattern of land status are present could affect the manageability of a WSA as wilderness. The EIS concludes that the irregular land ownership pattern could result in impacts to the wilderness character of the WSA due to incompatible adjacent land uses. This was the Bureau's conclusion because they were not certain the wilderness character of this area could be preserved in the long run.

10

jewelry
body adornment
ritual art

CAROL S. KESTLER
1311 EAST DUKE DRIVE
TUCSON, ARIZONA 85719
(602) 793-0185

June 21, 1983

Bureau of Land Management
425 East 4th Street
Safford, AZ 85546

Dear people:

Thank you for sending me a copy of the Draft Wilderness Environmental Impact Statement for the Safford District. As an owner of record of 76 acres in Cochise County, I am vitally concerned about the future of this area. I congratulate you for the thoroughness of the report.

I concur with your recommendations for Needles Eye, Black Rock, Fishooks and Happy Camp. Although not happy about the conclusions for the Peloncillos, I understand that VRM-1 status is the most managable alternative available. I am concerned for the recommendations for Day Mine, Gila Box, Turtle Mountain and Javalina Peak, as discussed below.

10-1 Day Mine represents a transition vegetation type not represented in the NWPS system. Furthermore, it provides outstanding opportunities for wilderness use and protection for important raptor nesting sites and rare riparian environments. The assumption that it will not be developed if not declared wilderness appears to me to be a dangerously optomistic one, not sufficiently safeguarding the public interest, values to succeeding generations, and the biosphere.

10-2 Gila Box is a unique area: unique in vegetation type, containing the last free-flowing stretch of the Gila, housing a winter population of bald eagles, and including important cultural sites. Current ORV use is impacting adversely on sections of the river, tearing up vegetation, and vandalizing cultural sites. I would personally like to see the entire Gila Box closed to ORV's. I realize that the enforcement problems would be severe, and would therefore recommend a more workable alternative of "Enhanced Wilderness". Although not as desirable, "Moderate Wilderness" would protect a minimal area. I strongly object to the proposed policy of not designating Gila Box as wilderness.

10-3 Turtle Mountain is again a unique area because of vegetation types not currently represented in the NWPS. Failure to designate it will undoubtedly lead to loss of vegetation types due to intensive grazing. Such use would endanger the bighorn sheep in the area, and possibly the privacy required by the raptors, should geothermal energy use also be developed. I therefore recommend an "Enhanced Wilderness" status for this area, and strongly endorse the BLM's suggestion for a land exchange.

10-4 Javalina Peak and the Whitlocks offer rare opportunities for solitude in an area not yet fully explored. There are vegetated dunes of ecological significance, as well as paleontological sites. I realize that there is conflict in these areas with ORV use and mineral exploitation. I personally would like to see an "All Wilderness" designation to protect these specific features. I understand, however, the management problems involved and therefore recommend an "Enhanced Wilderness" approach. I feel that the assumption that non-designation will not impair the wilderness is too naive.

I appreciate the care and work which has gone into the Impact statement, and appreciate consideration of my views in this process. Since I am currently out of state, returning July 20, I do not know whether I will be able to get to the Tucson hearing.

Sincerely yours,

Carol S. Kestler

RESPONSE — LETTER 10

10-1 Current information indicates there will be a few minor land use proposals (see Day Mine, Chapter 2) that would have a minimal impact on wilderness values. The BLM cannot absolutely conclude there will be no major future land use proposals, but should they occur, the Bureau will take the necessary action to properly safeguard the resources, public interest and future generations.

10-2 See Response 1-2.

10-3 The grazing system on Turtle Mountain is currently a yearlong system. The goal of the allotment (grazing) management plan is to change to a rest rotation system where certain pastures will be rested while others are being grazed. This grazing system, along with the rugged nature of the allotment, will provide adequate habitat for the bighorn sheep that use the area. Intensive grazing management on Turtle Mountain will lead to a proper level of forage utilization, not to the loss of vegetation.

Turtle Mountain WSA is in the Gila-Peloncillo Habitat Management Area. A habitat management plan (HMP) was prepared that details planned actions to improve wildlife habitat. Specific objectives of the HMP direct BLM to:

1. Maintain and enhance raptor nesting and hunting habitats to provide for optimum species diversity and density, with special management attention given to state and federal threatened and endangered species.
2. Protect and enhance broadleaf riparian habitat where feasible, wherever it exists within the habitat area.

In addition, the decision of the Gila Box Geothermal Leasing Proposal Environmental Assessment (BLM 1981b) stipulated that lands within one-half mile either side of the Gila River, San Francisco River, Eagle Creek and Bonita Creek would be offered for lease with a no surface occupancy provision. This decision was made to protect the riparian habitat and the threatened and endangered wildlife species. If needed, stipulations may be added whenever a site-specific proposal for exploration is received.

10-4 Most of the ORV use in the Javelina Peak area occurs on the dunes in the southern part of the WSA, with additional use outside the WSA. The current level of ORV use is not adversely affecting the entire dune system although increased use could adversely impact the mesquite dunes. Should this happen, BLM would restrict the use to an environmentally acceptable level. See Response 9-2 for a discussion on impacts to paleontological resources. Adverse impacts to vegetation and fossil resources resulting from mineral development would be mitigated through application of 43 CFR 3802 and 3809 (surface mining regulations). These regulations provide proper environmental protection in the development of mineral resources. See Response 10-1 for a discussion of the impacts of nondesignation. While it is true that the enhanced alternative alleviates management problems, it is felt that the overall quality of the lands in the enhanced wilderness is limited. There are no values that only wilderness management would preserve.

11

June 27, 1983

Fritz A. Rennebaum
District Manager: Bureau of Land Management
Safford District
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rennebaum:

I appreciate your response to my letter of comment on the Gila Box (WSA) for Wilderness designation. I have read very carefully. (Gila Box, AZ-4-22/23/24(A) (Map 5) the draft statement on the section I am referring to as above.

The proposed action recommended by your agency is negative because of conflicts with ORV use in the canyon bottoms.

Now Mr. Rennebaum I have been a licensed guide in Canyonlands National Park for ten years previous to this date. I know the impact ORV's have on any terrain whether river bottoms or mountain roads. Believe me when I state that the drivers of such vehicles delight in tearing up virgin terrain--just to demonstrate the power of their vehicles. They also are responsible for uncontrolled use of campfires which caused a complete burn-out of one particular canyon that was a sanctuary for wildlife. I have personally packed out bags of beer cans, bottles, paper products, discarded camp equipment, buried the remains of hunters activities--their entry to back country was via ORV's. No other way to get in. Now I can drive an ORV as well as anyone but I have always respected NO TRESPASSING, private or posted wilderness signs.

11-1 SO WHAT IS WRONG WITH POSTING WILDERNESS AND CLOSING EXISTING ROADWAYS INTO THE GILA BOX? A very simple solution to your proposed action. The ORV use was the ONLY reason the study came up with. The geothermal potential will be years into the future. The cherrystem road system is a weak excuse. The proposed Camelsback Dam is an unconscionable project on a riparian system that is already damned to its inevitable complete death.

If the ORV owners need an area to have their fun in, for heaven's sake why does it have to be the river bed? Why not designate a district in some area of BLM land that would give the hot shot drivers a lot of fun and a bunch of sand hills to play with. This system has worked out beautifully in Utah much to the delight of the BLM. Give it some thought?

Sincerely, Enid C. Howard
P.O. Box 505
Pearce, AZ 85625

Enid C. Howard

RESPONSE — LETTER 11

11-1 See Responses 1-2 and 9-1.

12

ARCC American Rivers Conservation Council
323 Pennsylvania Avenue S.E. Washington D.C. 20003 Telephone (202) 547 6900

June 29, 1983

Lester Rosenkrance
District Manater
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

Thank you for the opportunity to comment on the draft Safford District Wilderness Environmental Impact Statement. The American Rivers Conservation Council (ARCC) is an national non-profit membership organization concerned with the preservation of the nation's remaining free-flowing rivers and streams.

12-1 Our major concern with the Statement is that adequate protection would not be given to portions of three perennial streams (Mescal Creek, and the Gila and San Francisco Rivers) in the study area under the proposed alternative.

While the EIS does suggest that Wild and Scenic River Status would be appropriate for these streams, there is no clear committment on the part of the Bureau of Land Management to follow up on the suggestion. This problem could be resolved by the Bureau recommending to Congress, part of the Wilderness package, that the Gila be designated a Wild and Scenic Study River, and that the San Francisco, currently under study for Wild and Scenic Status, be recommended for inclusion in the National System. The final EIS should be revised to reflect this recommendation.

In addition, the EIS outlines your efforts to reestablish broadleaf riparian vegetation along these streams. ARCC supports continuation of these efforts.

Sincerely,

Christopher N. Brown

Christopher N. Brown,
Conservation Director

A Decade of Working to Preserve America's Rivers
1973-1983

RESPONSE — LETTER 12

12-1 The National Park Service completed an inventory of the nation's remaining free-flowing rivers deserving study for possible inclusion into the National Wild and Scenic Rivers System. Identified in that inventory were two segments of the Gila River: the segment through the Gila Box and the segment below Coolidge Dam to Winkelman, Arizona. It will be BLM's responsibility to study these river segments to determine their suitability for inclusion in the system. The purpose of this EIS is to address the question of wilderness suitability. This EIS will not make recommendations concerning wild and scenic river designation because that issue, while addressed, was not analyzed. Park Service studies identified more of the river deserving study than is found in the WSAs.

The San Francisco River in Arizona has been studied (1982) for inclusion in the system and recommended by the Apache-Sitgreaves National Forests and BLM for no designation.

Mescal Creek is within the Needle's Eye WSA that has been recommended for wilderness designation.

13

Mr. Steve Knox
EIS Team Leader
BLM SAfford District

03.07.83.

Dear Mr. Knox,

Recieved ths Draft Wilderness EIS and whsn I begun to make my comments I found it did not contain some information I needsd. I have visited and hiked in some of the WSA-s in this EIS but even so need additional information. I shall not return to Safford area until Sept. or Oct.; so I would appreciate if you would send me the maps and data I outline below:

13-1 1. Your nine maps covering the individual WSA-s do not show the location of ways. Some can be placed from reading the text but majority can not, since even when a geographical name is mentioned of a canyon,wash etc. that name does not appear on the map. Example p.16 for 4-1A the study states"Manageability would be further enhanced by excluding a vehicle way that impairs naturalnes....". Which one? Where? How deep penetration? Therefore please send copies from your files of the 9 WSA-s showing the location of the ways. The other BLM Districts DEIS for AZ and NV all show the location of ways. Your maps are the smallest least informative alternative maps I have seen. Example:Upper Sonoran Draft EIS,Phoenix District; Schell RA DEIS Nevada and others show all vehicle ways. Also many districts make available to the peopls who wish to comment their Wilderness Technical Report (WTR) and MFP.

13-2 2. To add to the difficuly with your DEIS maps in the Statement you have got your township numbers wrong!"Map 9 T14S should read T13S; T16S is really T15S and T15S is in reality T14S.

13-3 3. Any useable hot springs in any WSA besides Gillard? By useabls I mean recreational use, for soaking.

13-4 4. Gila Box p.42 states "...and a 80-acre private inholding that has no acces" Tha Map 5 shows one 80 acre inhoding with a cherrystem road to it. Which is in error the map or the statement?

13-5 5. WSA Turtle Mountain. On map6 the inholding in section 16 is marked state ownership. The text lets to believe it is private. Is this map wrong? Also please comment if there is any access to the other inholdings. The map shows none.

There are numerous other conflicts in information between
maps and text, but I presume that the maps you be sending me
will have the correct information and showing all the ways (vehicle)
13-6 as is customary. Have you or will you publish a Wilderness
Technical Report (WTR)?
Thanking in advance for the more detailed WSA maps and additional
information and material,

Sincerely,

Harry Melts

Harry Melts
Box 668
Creston,BC
Canada
VOB IGO

RESPONSE — LETTER 13

13-1 Vehicle ways have been added to the maps. Refer to the maps in this document.

13-2 This has been corrected.

13-3 There are no other usable hot springs in any WSAs.

13-4 While the map symbol for the road touches the inholding boundary, the cherrystem road does not enter the inholding.

13-5 Section 16 is a state section. There is a cherrystem road in Section 2, T. 5 S., R. 28 E. The remaining inholdings have no vehicle access.

13-6 We have not prepared Wilderness Technical Reports. Our analysis was conducted through amendment of existing Management Framework Plans (MFP) and this EIS. The MFP amendments are available for public inspection in the district office.

14

July 9, 1983

District Manager, BLM
425 E. 4th Street
Safford, AZ 85546

Dear Manager,

I have personally traveled through the country we refer to as the Gila Box. During my travels I have found this area to be of exceptional quality for providing solitude and the opportunity to observe and experience the diverse geology, flora and fauna of the area.

Arizona is rapidly being robbed of its
valuable riparian resources. Today these
most productive of our native habitat types
are a fraction of their former selves. We
need to provide long term protection
for these few remaining free flowing
waterways such as the Gila Box area
14-1 of the Gila River. In addition, it is my
opinion that continued use of this area by
off-road vehicles is in direct conflict
with the existing wilderness quality of the
Gila Box country and should be discontinued

My final point centers on the historic

significance of the Gila Box. In December 1824, James Ohio Pattie and a band of fur trappers first entered into Arizona through the Gila ~~Box~~ River System. This is the first known entry of Americans into the Arizona Territory. His narrative of their travels into and around the Gila Box Country provide us with the first accounts of our ancestors pioneer efforts in Arizona. How fitting that the Gila Box area, all 17,831 acres, be placed in the American Wilderness System to preserve that first point of entry in its origonal state.

It is for the above reasons that I urge you to designate this treasured natural and historic resource a wilderness area.

Sincerely,

Bill Watt
1740 N Joi Rd
Tucson, Az 85704

RESPONSE — LETTER 14

14-1 See Response 1-2.

15

P.O. Box 656
Logan, UT 84321

July 10, 1983

Mr. Lester Rosenkrance
District Manager
Safford District
USDI Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Les:

Thank you for sending me a copy of the draft EIS (DEIS) on wilderness for the Safford District. Since I cannot attend one of the hearings this month, I would like to comment on the document, offering both a general endorsement of Wilderness on the District and support of "Moderate" Wilderness for the Gila Box, unit 4/22/23/24 "A". First, I want to commend you and your staff for a compact, well-organized, very readable and well-illustrated document. It obviously reflects the careful thought and steady work of many capable people, and it is quite informative about the District and its setting.

As you may expect, I disagree with BLM on the proposed action for the Gila Box. The Bureau has rested its case against any Wilderness on the grounds that off-road vehicle (ORV) drivers would be excluded and that it would also be very difficult to revegetate the river channel as called for in the Habitat Management Plan (HMP). Surprisingly, the long-standing and vociferous opposition of mainly Graham County residents to any Wilderness for the canyon receives scant mention or analysis compared to ORV's, a matter we thought of comparative insignificance. In asking BLM to reconsider the recommendation, I'd like to point out several things:

15-1

(1) Since ORV's are already allowed in the Wilderness Study Area (WSA) under the Interim Management Policy, can't they be used for a period of years to accomplish work specified in the Habitat Management Plan, then excluded once and if the Gila Box is classified as Wilderness? The DEIS gives us no estimate of the length of time required to do the work, but I would assume it is not much longer than to the rest of the decade. Second, although I appreciate the ORV drivers' willingness to volunteer their time and vehicles, I wonder if they wouldn't become a vested interest given preferential treatment whenever a question arose concerning motorized visitor vs. nonmotorized visitor conflicts or infringement on wildlife.

(2) Related to the point just stated, why were't other groups, for example Wildlife Federation members, Audubon Societies, and wildlife students, asked if they would like to help with planting and watering? It seems only fair to have done so, also asking whether the volunteers would work on foot, with

Mr. Lester Rosenkrance
Safford District Manager
July 10, 1983
p. 2

ORVer's, or with BLM and BLM vehicles. As it stands now, the DEIS gives no indication that groups whose interests are most directly related to restoration of the riparian community were asked to help, and the reader gains the impression that Wilderness is being precluded not only because ORV drivers would be shut out but because they are considered essential to the HMP work. Are they?

15-1

(3) On such a substantial source of disagreement as ORV access, perhaps BLM should describe:

(a) the origins and socioeconomic status, so far as these are known, of the ORV recreationists;

(b) the routes they customarily take;

(c) what actions besides driving they enjoy while in the WSA;

(d) alternate areas where they might enjoy the same activities; and

(e) quite importantly, the types of vehicles they use. There would be a distinction between a conventional four-wheel drive, relatively quiet and not very mobile, and much noisier and more agile machines. As you know, 3- and 4-wheel ATV's have increased tremendoosly in popularity. A bevy of these can have a terrific acoustic and visual impact on a localized area, quite aside from any scars they may leave in soft surfaces. It's technological and recreational-taste developments like these that make conservationists and wildlife specialists apprehensive about open-ended use of such remarkable areas. Problems may develop, or they may not, but the DEIS hasn't addressed the "value" question of appropriateness in the inner canyon at any time, nor is there a suggestion that they could get out of control.

(4) The DEIS mentions the difficulty of patrolling the area to enforce an ORV closure in connection with wilderness, but I think that the importance of the area warrants a ranger. BLM could allot some of the fees collected from river users to supporting a patrol person. I'm sure the Bureau has effectively dealt with much more severe closure and enforcement problems before; after all, there are only three avenues of access to the Gila Box for a vehicle.

Mr. Lester Rosenkrance
Safford District Manager
July 10, 1983
p. 3

Once ORV's are not a problem, I can see little objection to the compact Wilderness alternative corresponding to "moderate" Wilderness. Here we woold obtain considerable river mileage, of very high quality, for the acreage set aside, leaving miles and miles of river corridor open to motor vehicles. I would, parenthetically, prefer to see the 2+ - mile stretch from the confluence of the San Francisco and Gila on down to Eagle Creek closed. The "moderate" boundary would also entail minimal contact with private lands. Naturally, there woold be opposition to such a recommendation, both from Camelsback Dam proponents and from persons unable to drive clear through the Box, but just about any national-level protection of the Gila Box is going to have impacts. However, I think that a Wilderness or Wild River is what is called for here, for the "core", and BLM can anticipate citizen and possibly governmental efforts to override the proposed action through a bill in Congress.

I should point out that preservationists familiar with the entire Upper Gila Complex don't advocate that very much of it be placed under a highly restrictive classification. Rather, they have sought, quite justifiably but unsuccessfully, a Congressionally-mandated study under the auspices of the Wild and Scenic Rivers Act, plus recognition that from the confluence on down to about Bonita Creek exists an extraordinary stretch of river. I'd personally be quite content, as I indicate, with a small Wilderness flanked by administratively-designated river stretches or by Scenic or Recreational River segments. The failure of the Arizona Congressional delegation to authorize a W&SR study led defenders of the river to put reliance on the Wilderness inventory as the prime means to have the various protective alternatives weighed, but they did not thereby mean that everything of concern to them should be recommended for Wilderness.

Since I am professionally involved in working with federal agencies in Utah to achieve conservation goals through relatively small, administrative setasides, I commend the authors of the DEIS for imaginatively considering and describing these (page 82 and Glossary). The Gila Complex, for example, certainly contains some prime Research Natural Area candidates, and I think that scientists with the Arizona Natural Heritage Program, ASU, Game and Fish, and the U. of A. would be more than willing to perform the necessarily detailed surveys to justify one or more RNA's. You may recall that the Pelloncillo Mountains contain a combination RNA and ACEC.

15-2 To improve on the use of the Bailey-Kuchler scheme for assessing representation of landforms and vegetation within all the WSA's, may

15-2 I suggest a close look at "Biotic communities of the American Southwest - United States and Mexico", in a recent, special issue of Desert Plants magazine (published by the University of Arizona for the Boyce Thompson Southwestern Arboretum). At least four of the major authors of this very informative work (Brown, Minckley, Turner, and Lowe) have been through or to the periphery of the Gila Box and undoubtedly have inspected much of the rest of the District. Their descriptions are based on years of experience and would doubtless help you better discern what communities and associations are within the WSA's. I don't think there is any stipulation in the Wilderness Study guidelines to preclude active use of more "local" classifications and descriptions of vegetation than Bailey-Kuchler.

Thank you for considering these comments. I very much hope that you will alter your recommendation for the Gila Box, and I look forward to reading the supplement to the DEIS containing my letter and others'.

Sincerely yours,

Nick Van Pelt
Nicholas Van Pelt
(Utah State University)

cc: Thor Lane, Arizonans for
Wild and Scenic Rivers, Cortaro

RESPONSE — LETTER 15

15-1 See Response 1-2.

The riparian planting project was initiated in 1984 to re-establish native broadleaf riparian tree populations along the Gila and San Francisco Rivers. The life of this project is unknown because it is subject to several variables including: acreage of plantable ground available; acquisition of trees and equipment; survival rate of planted trees; and frequency of flooding. While it is desirable to complete the planting as quickly as possible, the number of sites planted each year will depend on how many tree planters can be obtained, length of the planting season, and how many watering systems can reasonably be installed and maintained. Until the unknowns of this project are determined (often through trial and error), the life of the project is unknown.

The planting project uses volunteers from a local ORV group as well as other non-motorized volunteers. Volunteers, whether motorized of non-motorized, will not establish any vested interest or receive preferential treatment for future use of the river canyons.

See Chapter 3, Recreation, Gila Box for a description of ORV use.

15-2 Bureau policy requires the assessment of ecosystems and landforms in the WSAs in order to determine if a WSA would add to the diversity of the National Wilderness Preservation System (NWPS). The Bailey-Kuchler Ecosystem Classification System (Kuchler and Bailey 1978) was chosen because it provides current and comprehensive knowledge about the ecosystem geography of the United States and is, therefore, a useful reference in comparing ecosystems and landforms of all currently designated and/or proposed wilderness areas. Public comment identified the transition, within the WSA, from the Chihuahuan to the Sonoran Desert vegetation types. The BLM recognizes the significance of these geographical categories and the contribution these deserts could make to the expansion and diversity of the NWPS.

16

LLOYD L. GLOVER
JODEAN B. GLOVER
P. O. Box 1073
Safford, Arizona 85546

July 18, 1983

TO WHOM IT MAY CONCERN:

We do not see by putting Black Rock into a wilderness area that anything is being accomplished; only creating more government jobs and paper work for it's employees.

My father, Oscar Blair, acquired the ranch on January 6, 1917, and I was born there. My husband and I helped manage the ranch the past twenty-five years, owning it the last ten years. During my lifetime spent in the Black Rock area, I certainly can see no changes in the scenic, wildlife, human imprints and activities, vegetation, or wilderness destruction. The lands look today, the same as they did to me of my first recollection, approximately sixty years ago. Some years the vegetation is much better than other years as the water is more plentiful, but that depends on "The Man" above.

We feel we have too much government involvement now. The country is no longer for the people, by the people, etc., but for the government, by the government, with the people being victims of our bureaucracy.

If the rancher did not maintain the windmills, develop existing springs by distributing water to strategic places, haul water when the springs dry up, there would by a drastic reduction in wildlife. So far, I have never heard of the environmentalists, hunters, or Game Department checking to see if game water holes have dried up.

If you want to destroy the area in a hurry, just declare it a "Wilderness Area". You will have an influx of people coming here to see what they have missed through the years. If you could control who came, it would be fine, but you get all kinds. There are some who are considerate--who leave the area as they find it, with consideration for others. Then there are some who just plain don't give a d---. They destroy, poach the wildlife, kill the livestock, blow holes in your stock tanks and windmills, and steal what they can. Who is going to ride herd on these hikers, backpackers, horseback riders, hunters, rock hounds, birdwatchers, photographers, sightseers, and throw in all the no-goods that are just out looking for something to destroy?

16-1 There was no mention of where the facilities would be located for the above mentioned to camp, park, etc. Practically all the accessible road is a cross patented ground. If they start parking and camping on reservation ground, it could possibly cause a closure of the road across the reservation which would cause an extreme hardship on the ranchers. So far the tribal council has been very cooperative with the ranchers, but with a change of status of the land, they could also change their views.

We have invested a considerable amount of money and years of hard labor to improve the entire allotment, so in our latter years (which is now) we could sustain ourselves without anxiety of how we would pay the bills, buy groceries, pay doctor bills, etc. and now we are slapped with this prospect. We feel

16-2 with the area being declared a "Wilderness Area" our income will decrease and we will suffer a substantial decrease in valuation of our property. In fact, we feel we do not know where we stand concerning our grazing permits in conjunction with the "Wilderness Area." We feel they have guaranteed us no security in regards to our grazing allotments. At our ages it would be rather hard to start over again and that is what we feel you are trying to eventually force us to do.

So in closing we say, leave the land as it is; as it is being well managed now by the BLM and forest service with due consideration for everyone.

Respectfully,

Jo Dean Glover
JODEAN B. GLOVER

Lloyd L. Glover
LLOYD L. GLOVER

RESPONSE — LETTER 16

16-1 Currently ranchers in the Black Rock area and the San Carlos Apache Tribe are experiencing recreation visitor management problems (vandalism, trespass, theft of firewood). This area has always been popular with residents of the Safford Valley and Arizona for hunting, picnicking, hiking and four-wheel driving. Whether or not Black Rock becomes wilderness, the ranchers and the Tribe will continue to have some problems with recreationists. BLM, however, is committed to lessen or resolve visitor-related problems that result from its management of the public lands. Possible actions under consideration include a signing program to educate the public about the private property and the Reservation along Black Rock road and to remind them to respect the rights of private property owners. This educational campaign would also apply to state, BLM and Forest Service lands in the area. In progress is the relocation of the Gardiner Canyon, Black Rock and Preacher Canyon trailhead to BLM land at a location away from the private land. The trailhead is currently accessed by crossing private property. Relocation will help relieve some of the problems the private owner has with visitors parking and camping on his land.

Should Congress designate Black Rock WSA as wilderness, BLM will develop a wilderness management plan. With the aid of the public, the plan will address management facilities such as trailheads, campgrounds and parking facilities. With proper visitor management, buffers between the wilderness and private land will not be necessary.

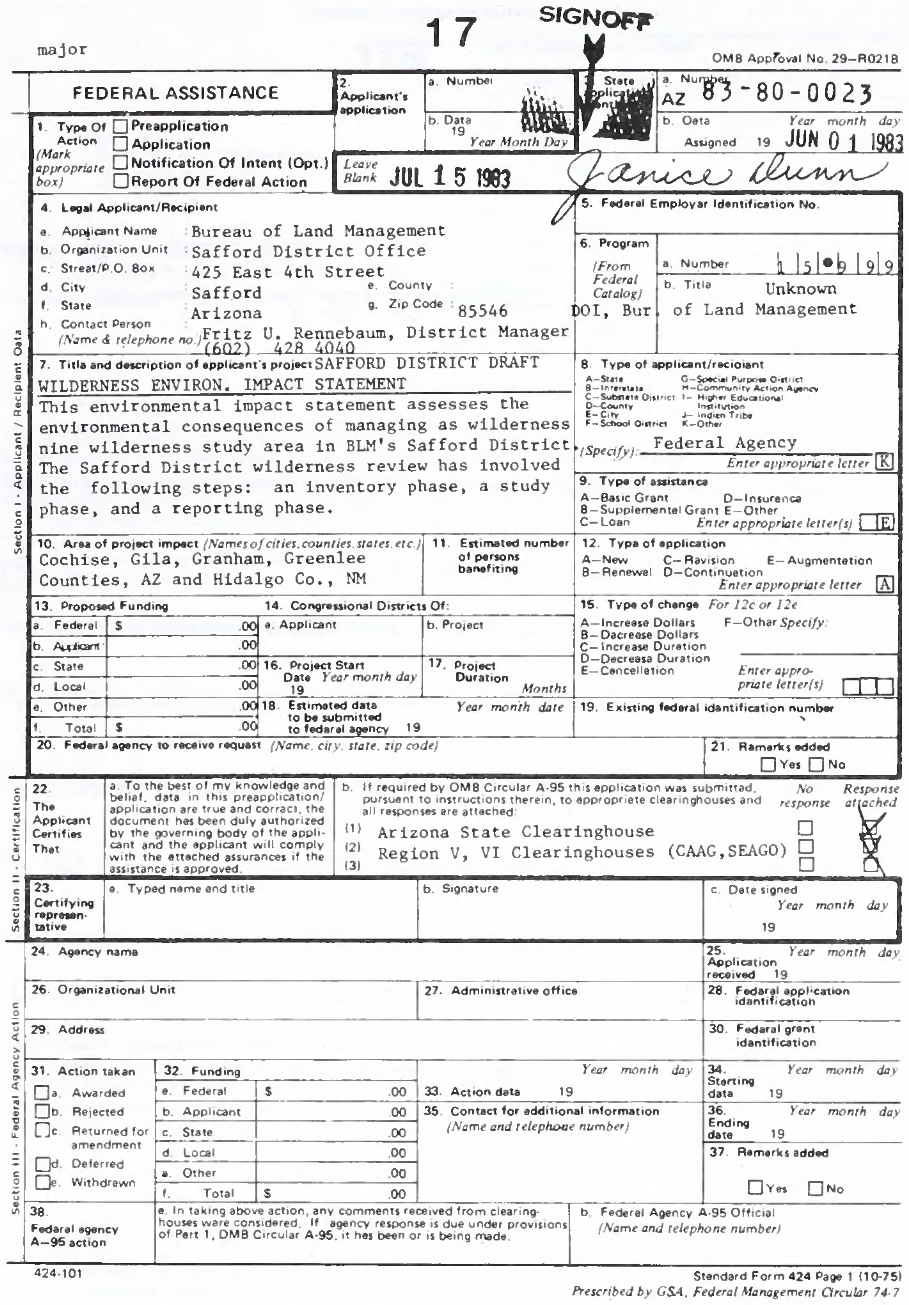
16-2 Directly, wilderness designation will not adversely affect grazing permit numbers or ranch income. Indirectly, designation may prevent future increases of permit numbers and thus ranch income if livestock facilities (waters, fences, etc.) are not allowed due to their impact on the wilderness character of the area. It is difficult to determine what effect wilderness designation may have on ranch values. That depends on many variables including condition of the ranch, existing and planned grazing systems, numbers of AUMs, planned range improvements and the prospective buyer's attitude about the effect of wilderness management on a grazing operation. Ranch values may decrease with designation if prospective buyers view wilderness as a constraint on livestock grazing or desired livestock management objectives cannot be implemented. However, it is also possible ranch values may increase. Livestock numbers (AUMs), ranch income and ranch values can all be affected by wilderness designation. The effect depends upon the specific ranch situation.

The Wilderness Management Policy (See Appendix No. 2) and Section 4(d)(4)(2) of the Wilderness Act state that livestock grazing in an area before it becomes wilderness can continue after wilderness designation. The objective of livestock management in wilderness areas is to utilize the forage without degradation of wilderness or range/forage resources.

Further policy and guidance on livestock management in designated wilderness is provided by the Conference Report on S.2009 (House Report 96-1126) entitled "Grazing in National Forest Wilderness Areas." These Congressional guidelines are incorporated into the BLM Wilderness Management Policy and provide direction on management of livestock in BLM wilderness areas. The Wilderness Act includes the following nationwide guidelines and specific statements of legislative policy concerning livestock grazing.

1. There shall be no reduction of grazing in wilderness areas simply because the area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by managers to slowly "phase out" grazing.
2. The maintenance of supporting facilities, existing in an area prior to its designation as wilderness (including fences, line cabins, water wells and lines, stock tanks, etc.), is permissible in wilderness.
3. The replacement or reconstruction of deteriorated facilities or improvements should not be required to be accomplished using "natural materials", unless the material and labor costs of using natural materials are such that their use would not impose unreasonable additional costs on grazing permittees.
4. The construction of new improvements or replacement of deteriorated facilities in wilderness is permissible if in accordance with wilderness and livestock grazing guidelines and management plans governing the area involved.
5. The use of motorized equipment for emergency purposes such as rescuing sick animals or placement of feed in emergency situations is also permissible.

In summary, the general rule on grazing management in wilderness is that activities or facilities established prior to the date of an area's designation as wilderness would be allowed to remain in place and may be replaced when necessary for the permittee to properly administer livestock grazing. Thus, if livestock grazing activities and facilities are established in the area at the time Congress designates the area wilderness, they should be allowed to continue.



major

17

SIGNOFF

OMB Approval No. 29–R0218

FEDERAL ASSISTANCE

1. Type Of Action (Mark appropriate box) ☐ Preapplication ☐ Application ☐ Notification Of Intent (Opt.) ☐ Report Of Federal Action

2. Applicant's application a. Number b. Date 19 Year Month Day

3. State Applicat[illegible] a. Number AZ 83-80-0023 b. Date Assigned 19 Year month day JUN 01 1983

Leave Blank JUL 15 1983

Janice Dunn

Section I · Applicant / Recipient Data

4. Legal Applicant/Recipient
a. Applicant Name : Bureau of Land Management
b. Organization Unit : Safford District Office
c. Street/P.O. Box : 425 East 4th Street
d. City : Safford
e. County :
f. State : Arizona
g. Zip Code : 85546
h. Contact Person (Name & telephone no.) : Fritz U. Rennebaum, District Manager (602) 428 4040

5. Federal Employer Identification No.

6. Program (From Federal Catalog) a. Number 1 5 ● 9 9 9 b. Title Unknown
DOI, Bur of Land Management

7. Title and description of applicant's project SAFFORD DISTRICT DRAFT WILDERNESS ENVIRON. IMPACT STATEMENT

This environmental impact statement assesses the environmental consequences of managing as wilderness nine wilderness study area in BLM's Safford District. The Safford District wilderness review has involved the following steps: an inventory phase, a study phase, and a reporting phase.

8. Type of applicant/recipient
A–State G–Special Purpose District
B–Interstate H–Community Action Agency
C–Substate District I– Higher Educational Institution
D–County J– Indian Tribe
E–City K–Other
F–School District
(Specify): Federal Agency
Enter appropriate letter K

9. Type of assistance
A–Basic Grant D–Insurance
B–Supplemental Grant E–Other
C–Loan
Enter appropriate letter(s) E

10. Area of project impact (Names of cities, counties, states, etc.) Cochise, Gila, Granham, Greenlee Counties, AZ and Hidalgo Co., NM

11. Estimated number of persons benefiting

12. Type of application
A–New C–Revision E–Augmentation
B–Renewal D–Continuation
Enter appropriate letter A

13. Proposed Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other		.00
f. Total	$	.00

14. Congressional Districts Of: a. Applicant b. Project

15. Type of change For 12c or 12e
A–Increase Dollars F–Other Specify:
B–Decrease Dollars
C–Increase Duration
D–Decrease Duration
E–Cancellation
Enter appropriate letter(s) ☐☐☐

16. Project Start Date Year month day 19

17. Project Duration Months

18. Estimated date to be submitted to federal agency Year month date 19

19. Existing federal identification number

20. Federal agency to receive request (Name, city, state, zip code)

21. Remarks added ☐ Yes ☐ No

Section II · Certification

22. The Applicant Certifies That

a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved.

b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached:

		No response	Response attached
(1)	Arizona State Clearinghouse	☐	☒
(2)	Region V, VI Clearinghouses (CAAG,SEAGO)	☐	☒
(3)		☐	☒

23. Certifying representative a. Typed name and title b. Signature c. Date signed Year month day 19

Section III · Federal Agency Action

24. Agency name

25. Application received Year month day 19

26. Organizational Unit

27. Administrative office

28. Federal application identification

29. Address

30. Federal grant identification

31. Action taken ☐ a. Awarded ☐ b. Rejected ☐ c. Returned for amendment ☐ d. Deferred ☐ e. Withdrawn

32. Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other		.00
f. Total	$	.00

33. Action date 19 Year month day

34. Starting date Year month day 19

35. Contact for additional information (Name and telephone number)

36. Ending date Year month day 19

37. Remarks added ☐ Yes ☐ No

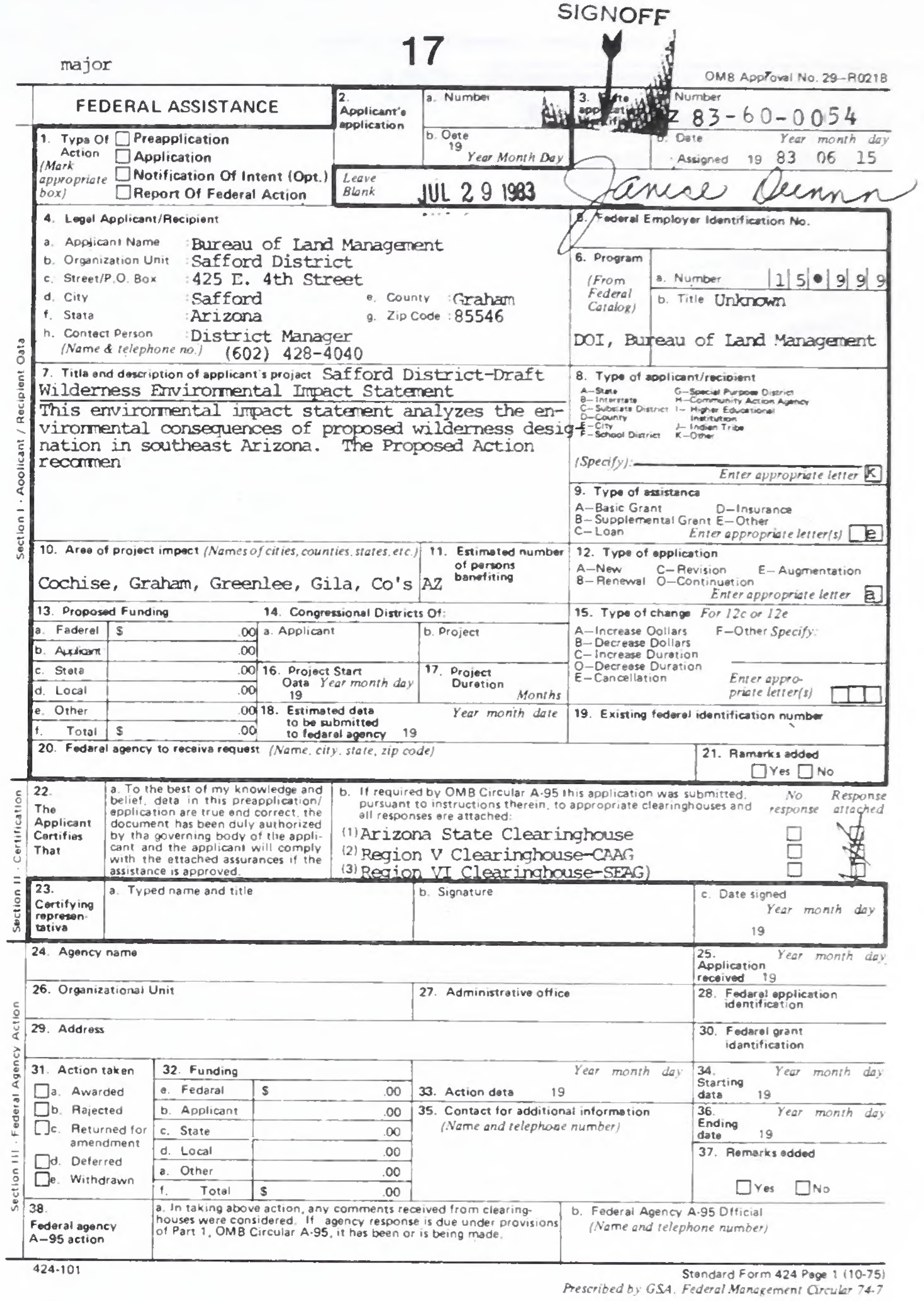
38. Federal agency A–95 action

a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part 1, OMB Circular A-95, it has been or is being made.

b. Federal Agency A-95 Official (Name and telephone number)

424-101

Standard Form 424 Page 1 (10-75)
Prescribed by GSA, Federal Management Circular 74-7



major

17

SIGNOFF

OMB Approval No. 29–R0218

FEDERAL ASSISTANCE

1. Type Of Action (Mark appropriate box) ☐ Preapplication ☐ Application ☐ Notification Of Intent (Opt.) ☐ Report Of Federal Action

2. Applicant's application a. Number b. Date 19 Year Month Day

3. [illegible] Number Z 83-60-0054 b. Date Assigned 19 Year month day 83 06 15

Leave Blank JUL 29 1983

Janice Dunn

Section I · Applicant / Recipient Data

4. Legal Applicant/Recipient
a. Applicant Name : Bureau of Land Management
b. Organization Unit : Safford District
c. Street/P.O. Box : 425 E. 4th Street
d. City : Safford
e. County : Graham
f. State : Arizona
g. Zip Code : 85546
h. Contact Person (Name & telephone no.) : District Manager (602) 428-4040

5. Federal Employer Identification No.

6. Program (From Federal Catalog) a. Number 1 5 ● 9 9 9 b. Title Unknown
DOI, Bureau of Land Management

7. Title and description of applicant's project Safford District-Draft Wilderness Environmental Impact Statement

This environmental impact statement analyzes the environmental consequences of proposed wilderness designation in southeast Arizona. The Proposed Action recommen

8. Type of applicant/recipient
A–State G–Special Purpose District
B–Interstate H–Community Action Agency
C–Substate District I– Higher Educational Institution
D–County J– Indian Tribe
E–City K–Other
F–School District
(Specify):
Enter appropriate letter K

9. Type of assistance
A–Basic Grant D–Insurance
B–Supplemental Grant E–Other
C–Loan
Enter appropriate letter(s) e

10. Area of project impact (Names of cities, counties, states, etc.) Cochise, Graham, Greenlee, Gila, Co's AZ

11. Estimated number of persons benefiting

12. Type of application
A–New C–Revision E–Augmentation
B–Renewal D–Continuation
Enter appropriate letter a

13. Proposed Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other		.00
f. Total	$	.00

14. Congressional Districts Of: a. Applicant b. Project

15. Type of change For 12c or 12e
A–Increase Dollars F–Other Specify:
B–Decrease Dollars
C–Increase Duration
D–Decrease Duration
E–Cancellation
Enter appropriate letter(s) ☐☐☐

16. Project Start Date Year month day 19

17. Project Duration Months

18. Estimated date to be submitted to federal agency Year month date 19

19. Existing federal identification number

20. Federal agency to receive request (Name, city, state, zip code)

21. Remarks added ☐ Yes ☐ No

Section II · Certification

22. The Applicant Certifies That

a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved.

b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached:

		No response	Response attached
(1)	Arizona State Clearinghouse	☐	☒
(2)	Region V Clearinghouse-CAAG	☐	☒
(3)	Region VI Clearinghouse-SEAG)	☐	☒

23. Certifying representative a. Typed name and title b. Signature c. Date signed Year month day 19

Section III · Federal Agency Action

24. Agency name

25. Application received Year month day 19

26. Organizational Unit

27. Administrative office

28. Federal application identification

29. Address

30. Federal grant identification

31. Action taken ☐ a. Awarded ☐ b. Rejected ☐ c. Returned for amendment ☐ d. Deferred ☐ e. Withdrawn

32. Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other		.00
f. Total	$	.00

33. Action date 19 Year month day

34. Starting date Year month day 19

35. Contact for additional information (Name and telephone number)

36. Ending date Year month day 19

37. Remarks added ☐ Yes ☐ No

38. Federal agency A–95 action

a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part 1, OMB Circular A-95, it has been or is being made.

b. Federal Agency A-95 Official (Name and telephone number)

424-101

Standard Form 424 Page 1 (10-75)
Prescribed by GSA, Federal Management Circular 74-7

Comment Form To Be Completed by Reviewing Agency

83-80-0023

TO:

17A

State Application Identifier (SAI)

JUN 0 1 1983 83-80-0023
State AZ No

Department of Water Resources
Mr. Frank Barrios
99 E. Virginia
Phoenix, AZ 85004

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land

Parks
OEPAD: Mike Barry

Region V,VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

RECEIVED
JUN 6 1983
DEPT. OF
WATER RESOURCES

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project ☐ Proposal is supported as written ☒ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No

3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No

4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No

5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

SEE ENCLOSED COMMENTS

Reviewers Signature Frank M. Barrios Date 6/2/83
Title Chief of Planning Telephone 255-1546

17A-1

On page 55, item 7 under Assumptions, there appears to be an apparent contradiction where in one case it is stated that "Camelsback Dam or an alternative will not be built in or near Gila Box WSA." It is also stated that it is not known where the potential dam could be built.

If the first case is correct and a dam is not built within or near the Gila Box WSA, the stored water could still back into the WSA and could be considered a substantial environmental impact.

It is recommended that item 7's contradiction be clarified and that a general description be presented addressing the magnitude of impact that stored water might have on the Gila Box WSA.

Comment Form To Be Completed by Reviewing Agency

TO:

17B

State Application Identifier (SAI)

JUN 0 1 1983 State AZ No. 83-80-0023

Director
Agriculture & Horticulture Dept.
421 Capitol Annex West
Phoenix, AZ 85007

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land

Parks
OEPAD: Mike Barry

Region V,VI

RECEIVED
ARIZONA COMMISSION OF AGRICULTURE &

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project ☐ Proposal is supported as written ☒ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No

3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No

4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No

5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary): Wilderness designation needs to meet the total public needs not for just a few. Some of these proposed areas have little visitor traffic in their present status so why the the management of these lands for multiple use as they are now assigned

Reviewers Signature

Date 6-3-83

Title Director, Division of Compliance

Telephone 4373

Comment Form To Be Completed by Reviewing Agency

TO:

17C

State Application Identifier (SAI)

JUN 15 1983 State AZ No. 83-60-0054

Director
Agriculture & Horticulture Dept.
421 Capitol Annex West
Phoenix, AZ 85007

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AORCC
Land
Parks
OEPAD-Mike Barry

Region V, VI

RECEIVED
JUN 1 6 1983
ARIZONA COMMISSION OF AGRICULTURE & HORTICULTURE

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project ☐ Proposal is supported as written ☒ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No

3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No

4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No

5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary) The listed areas with the final deletion of orginally proposed acres where they didnt meet the criteria of wilderness and reduced the acreage can be supported.

Reviewers Signature

Date 6-17-83

Title Director Div of Compliance

Telephone 255-4373

Comment Form To Be Completed by Reviewing Agency

17D

State Application Identifier (SAI)

JUN 0 1 1983 State AZ No. 83-80-0023

TO:

Mr. Clinton M. Pattea
Executive Secretary
Indian Affairs Commission
1645 West Jefferson St.
Phoenix, AZ 85007

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land
Parks
OEPAD: Mike Barry

Region V,VI

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☒ No comment on this project ☐ Proposal is supported as written ☐ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No

3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No

4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No

5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

Reviewers Signature Clinton M. Pattea Date 6-6-83

Title______________ Telephone______________

Comment Form To Be Completed by Reviewing Agency

17E

State Application Identifier (SAI)

JUN 15 1983 State AZ No. 83-60-0054

TO:

Mr. Clinton M. Pattea
Executive Secretary
Indian Affairs Commission
1645 West Jefferson St.
Phoenix, AZ 85007

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AORCC
Land
Parks
OEPAD-Mike Barry

Region V, VI

ONA COMMISSION
JUN 16 1983 REC'D.
OF INDIAN AFFAIRS

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☒ No comment on this project ☐ Proposal is supported as written ☐ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No

3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No

4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No

5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

Reviewers Signature Clinton M. Pattea Date 6-27-83

Title______________ Telephone______________

Comment Form To Be Completed by Reviewing Agency

TO:

17F

State Application Identifier (SAI)

JUN 0 1 1983 State AZ No. 83-80-0023

Mr. John Blackburn, Exec. Dir.
Central Arizona Association
of Governments
P.O. Box JJ (1810 Main St.)
Florence, AZ 85232

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land
Parks
OEPAD: Mike Barry

Region V,VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature
Date 6-20-83
Title Environmental Planner
Telephone 868-5878

TO:

17G

State Application Identifier (SAI)

JUN 15 1983 State AZ No. 83-60-0054

Mr. John Blackburn, Exec. Dir.
Central Arizona Association
of Governments
P.O. Box JJ (1810 Main St.)
Florence, AZ 85232

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AORCC
Land
Parks
OEPAD-Mike Barry

Region V, VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature
Date 7-1-83
Title Environmental Planner
Telephone 868-5878

Comment Form To Be Completed by Reviewing Agency

17H

TO:

Robert K. Lane, Acting Commissioner
State Land Department
1624 W. Adams, 4th Floor
Phoenix, AZ 85007
Attn: Robert Yount

State Application Identifier (SAI)
JUN 0 1 1983 State AZ No. 83-80-0023

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land
Parks
OEPAD: Mike Barry

Region V,VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature Robert Yount
Date June 17, 1983
Title Land Manager
Telephone 255-4625

Comment Form To Be Completed by Reviewing Agency

17I

TO:

Robert K. Lane, Acting Commissioner
State Land Department
1624 W. Adams, 4th Floor
Phoenix, AZ 85007
Attn: Robert Yount

State Application Identifier (SAI)
JUN 15 1983 State AZ No. 83-60-0054

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AORCC
Land
Parks
OEPAD-Mike Barry

Region V, VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature Robert Yount
Date June 17, 1983
Title Land Manager
Telephone 255-4625

Comment Form To Be Completed by Reviewing Agency

TO:

17J

State Application Identifier (SAI)

JUN 0 1 1983 State AZ No. 83-80-0023

Dale Buskirk
Advanced Planning Section
Dept. of Transportation
206 So. 17th Ave., Rm 310 B
Phoenix, AZ 85007

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land
Parks
OEPAD: Mike Barry

Region V,VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature L. P. Stingley Date 6-9-83

Title State Planner Telephone 255-7251

Comment Form To Be Completed by Reviewing Agency

TO:

17K

State Application Identifier (SAI)

JUN 15 1983 State AZ No. 83-60-0054

Dale Buskirk
Advanced Planning Section
Dept. of Transportation
206 So. 17th Ave., Rm 310 B
Phoenix, AZ 85007

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AORCC
Land
Parks
OEPAD-Mike Barry

Region V, VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature L. P. Stingley Date 6-22-83

Title State Planner Telephone 255-7251

Comment Form To Be Completed by Reviewing Agency

TO:

17L

State Application Identifier (SAI)

JUN 0 1 1983 State AZ No. 83-80-0023

Mr. Terry B. Johnson
Arizona Natural Heritage Program
30 North Tucson Boulevard
Tucson, Arizona 85716

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land

Parks
OEPAD: Mike Barry

Region V,VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

Reviewers Signature Terry B Johnson Date June 10, 1983

Title Coordinator/ANHP Telephone 323-0867

Comment Form To Be Completed by Reviewing Agency

TO:

17M

State Application Identifier (SAI)

JUN 15 1983 State AZ No. 83-60-0054

Mr. Terry B. Johnson
Arizona Natural Heritage Program
30 North Tucson Boulevard
Tucson, Arizona 85716

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AORCC
Land
Parks
OEPAD-Mike Barry

Region V, VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary)

Reviewers Signature Terry B Johnson Date 24 June 1983

Title Coordinator/ANHP Telephone 323-0867

Comment Form To Be Completed by Reviewing Agency

17N

TO:

Mr. David Landrith
Executive Director, SEAGO
118 Arizona St.
Bisbee, AZ 85603

State Application Identifier (SAI)
JUN 0 1 1983 State AZ No. 83-80-0023

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land

Parks
OEPAD: Mike Barry

Region V,VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

830081

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature Richard V. Francaviglia Date 6/8/83
Title Program Manager Telephone 432-5301

Comment Form To Be Completed by Reviewing Agency

17O

TO:

Mr. David Landrith
Executive Director, SEAGO
118 Arizona St.
Bisbee, AZ 85603

State Application Identifier (SAI)
JUN 15 1983 State AZ No. 83-60-0054

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AORCC
Land
Parks
OEPAD-Mike Barry

Region V, VI

JUN 17 1983

830030

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature Richard V Francaviglia Date 6/21/83
Title Program Manager Telephone 432-5301

Comment Form To Be Completed By Reviewing Agency

17P State Application Identifier (SAI)

JUN 15 1983 State AZ No. 83-60-0054

Mr. John Jett, Director
Mineral Resources Department
Fairgrounds, Mineral Bldg.
1826 W. McDowell Rd.
Phoenix, AZ 85007

Indian Affairs — Region V, VI
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Arid Lands Studies
Az Natural Heritage Prog.
Water
AOPCC
Land
Parks
OIPAD-Mike Barry

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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Additional Comments (Use back of sheet, if necessary)

OVER

Reviewers Signature John N Jett Date 6 23 83

Title ______ Telephone ______

KNOW ALL MEN BY THESE PRESENTS:

That the BOARD OF GOVERNORS of the ARIZONA DEPARTMENT OF MINERAL RESOURCES has unanimously adopted the following resolution relating to multiple use of public lands:

RESOLUTION

17P-1 As a general principal, the Board of Governors of the Department of Mineral Resources supports multiple usage of any public land. Secondly, a mineral and water inventory must be taken before there are any permanent withdrawals into wilderness areas or any other restricted use areas.

17P-2 Any proposal for withdrawal of public lands from multiple usage shall be supported by a sociological, economic impact statement, showing an analysis of the cost-benefit factors involved, and taking into account the effect on national security by the withdrawal of any potential strategic mineral resources.

IN WITNESS WHEREOF, the undersigned members of the Board of Governors of the Arizona Department of Mineral Resources have hereunto set their hands officially at the City of Phoenix, State of Arizona, this 15 day of December, 1980.

Curtis J. Ritter
Curtis J. Ritter, Chairman

Curtis A. Jennings
Curtis A. Jennings, Vice Chairman

Richard C. Cole
Richard C. Cole, Secretary

Thomas A. Clary
Thomas A. Clary, Member

Ed Peplow, Member

Comment Form To Be Completed by Reviewing Agency

17Q

TO:

State Mine Inspector
Room 705, West Wing
Capitol
Phoenix, AZ 85007

State Application Identifier (SAI)

JUN 0 1 1983 83-80-0023
State AZ No.

Indian Affairs
Mineral Res.
Game & Fish
Transportation
Ag. & Hort.
Mine Inspector
Arid Land Studies
AZ. Natural Heritage
Tourism
Davis-Monthan AFB
Bu. of Geology & Mineral Tech.
Health
Water
AORCC
Land

Parks
OEPAD: Mike Barry
Region V,VI

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

STATE MINE INSPECTOR
JUN 02 1983

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Additional Comments (Use back of sheet, if necessary):

Reviewers Signature James H. McCutchen Date 6/6/83

Title Arizona State Mine Inspector Telephone 255-5971

RESPONSE — LETTER 17

17A-1 See Chapter 4, Assumption No. 7 as reworded.

17P-1 Section 603(a) of the Federal Land Policy and Management Act of 1976 requires mineral surveys be conducted by the U.S. Geological Survey and Bureau of Mines prior to any recommendation for designation of an area as wilderness. See Response 30-2 for further discussion. Since the BLM found no measurable, significant adverse impact to water resources, further water inventory is not necessary to develop the proposed recommendation.

17P-2 A recommendation of wilderness is not a withdrawal of public lands from multiple use. Wilderness emphasizes management of the wilderness values and other compatible multiple uses. For example, grazing, hunting and mineral development (under certain circumstances) are permitted in designated wilderness. However, wilderness designation will close an area to mineral entry, subject to valid existing rights.

The draft environmental impact statement (EIS) assesses the social and economic conditions as well as the anticipated impacts from the *Proposed Action* and each alternative. The impacts are discussed in this EIS. While a monetary cost-benefit analysis would be desirable, an accurate, reliable analysis is not possible. The primary problem is that the exact type and quantity of the mineral resources is not known. To further compound the problem, the economic picture and technology are everchanging, and both of these affect the value of a mineral deposit. Other problems include placing values on the benefits that are gained from wilderness designation. It is difficult to place a monetary value on preservation of natural settings, solitude or simply the existence of wilderness areas that many people desire. With the completion of mineral surveys by the U.S. Geological Survey and the Bureau of Mines, we will have a better knowledge of mineral resource values and potential. This information will be available to the Secretary of Interior, the President and the Congress, and will be used in the development of their recommendations and decisions. The Council on Environmental Quality regulations for implementing the National Environmental Policy Act provides for benefit-cost analyses, but it does not require it (40 CFR, Part 1502.23). The BLM feels the significant social and economic issues have been properly assessed in the EIS.

An assessment of the strategic mineral resources and the impacts resulting from the *Proposed Action* and each alternative is discussed in the Minerals and Energy section of both Chapter 3, Affected Environment and Chapter 4, Environmental Consequences.

18

State of New Mexico

GOVERNOR
TONEY ANAYA

DIRECTOR AND SECRETARY
TO THE COMMISSION
[illegible]

DEPARTMENT OF GAME AND FISH

STATE CAPITOL
SANTA FE
87503

STATE GAME COMMISSION
EDWARD MUNOZ, CHAIRMAN
GALLUP

J.W. JONES
ALBUQUERQUE

[illegible]

JAMES H. KOCH
SANTA FE

A. H. Gutierrez, Jr., M.D.
Carlsbad
Christine DiGregorio
Gallup

July 12, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 East Fourth Street
Safford, Arizona 85546

Dear Lester:

I have reviewed the draft Environmental Impact Statement prepared by the Bureau of Land Management for wilderness designation of wilderness study areas in the Safford, Arizona district.

The following comments are provided for your consideration:

Wildlife - page 43 and Impacts to Wildlife - page 74.

18–1 The statement is made that no wildlife projects are planned for the Peloncillo portion of the project area. According to Jack O'Neil (Regional Game Specialist, Arizona Department of Game and Fish, personal communication June 16, 1983) the portion of the Peloncillo Mountains in Arizona is under consideration for the reintroduction of desert bighorn sheep.

Affected Environment - page 44

18–2 Table 3-9 lists threatened, endangered and sensitive wildlife species. Since desert bighorn presently occur in the Peloncillo Mountains of New Mexico, and the possibility exists of dispersal into the Peloncillo Mountains in Arizona, desert bighorn should be listed as probable in Table 3-9.

Both coatimundi and rock rattlesnake have been verified in the Peloncillo range by Andy Sandoval of the New Mexico Department of Game and Fish.

Thank you for the opportunity to review and comment on the Safford District Wilderness Impact Statement.

Sincerely,

Harold
Harold F. Olson
Director

ea

RESPONSE — LETTER 18

18-1 The Gila-Peloncillo Habitat Management Plan identifies the Peloncillo Mountains as suitable habitat for desert bighorn sheep and thus the site was under consideration for reintroduction. Bighorn sheep were reintroduced in 1986.

18-2 The coatimundi, rock rattlesnake and desert bighorn sheep are listed on Table 3-9 as probable in the Peloncillo Mountains WSA. See Table 3-9.

19

July 18, 1983

District Manager, BLM
425 East 4th Street
Safford, Arizona 85546

Dear District Manager:

I recently had the destinct pleasure of rafting through the Gila Box. It was my first rafting experience and a very worthwhile one. We put in on the San Francisco River (approx. 5 miles above the Gila River) and paddled our way into the Gila River past Eagle Creek and Bonita Creek.

The 2 day trip was meaningful and rewarding to me in many respects.

1- For most of the rafting trip I saw little evidence of mans intrusion into the area.

2- I had the opportunity to paddle for much of the trip, which gave me the feeling of full participation.

3- Rafting down a free-flowing desert river and realizing the uniqueness of the experience and the importance of such a river to the wildlife of the area gave me a great deal of satisfaction.

4- The observed wildlife on this all-to-short trip consisted chiefly of lizards: whiptails to spinys and birds: Mallards to Blue-winged Teals, Great Blue Herons to a Screech Owl, Hooded Oriole to White-throated Swifts, Yellow-rumped Warblers to Verdins, Vermillon Flycatchers to Ash-throated Flycatchers, White-crowned Sparrows to Black-throated Sparrows, Gamble's Quails to Lesser Goldfinches, Red-tailed Hawk to Cardinals and numerous other unidentified species.

5- This rafting trip gave me periods of exhilaration, solitude and provided me the opportunity to meet an interesting group of people.

6- Realizing that what we were doing was fulfilling to us as humans without being destructive to the flora and fauna of the area was of special significance to me.

7- The rafting experience kindled an interest in me to backpack this Gila Box area to obtain a more thorough appreciation for the extent of wildlife dependent on the upper Gila River and tributaries.

8- Since learning that two great North American deserts (Sonoran and Chihuahuan) come together in this area, I'd like to locate this natural demarcation for myself and see just how the two adjacent deserts differ in soil type, plant life and animal life.

19-1 It's my understanding that ORV's are currently permitted to drive the upper Gila River, its tributaries and the surrounding desert area. This activity can only cause destruction to this unique free-flowing desert river, the fragile plant life of the area, and the wildlife dependent on both. Certainly many off road opportunities for motorized vehicles exist in the vicinity that would be much less detrimental to the natural environment.

I've also learned that a dam (Camelsback Dam) has been proposed for the Gila Box area. Such a dam would prevent rafting trips (such as I experienced), inundate considerable valuable wildlife habitat, and replace high quality riparian habitat with low quality riparian habitat. In addition, the water reservoir would attract hordes of people which in time would destroy most if not all of the numerous natural qualities of the area.

We as humans need to keep in mind that native wildlife diversity is something to protect not destroy.

In order for others to have the very enjoyable experience, I had, rafting the Gila Box, the area must be set aside with a special protective designation.

In order to retain the upper Gila River and San Francisco River as free-flowing desert rivers, the area must be set aside with a special protective designation.

In order to retain the high quality riparian habitat, the area must be set aside with a special protective designation.

In order to retain the diversity of native plant and wildlife of the area it must be set aside with a special protective designation.

In order to retain the variety and density of raptors (some of which are extremely rare in the U.S.) in the upper Gila River area, it must be set aside with a special protective designation.

In order to prevent man from destroying the enormous, yet fragile, natural qualities of the upper Gila River area, it must be set aside with a special protective designation.

In order to protect the area where two great deserts come together (Sonoran and Chihuahuan) the upper Gila River area must be set aside with a special protective designation.

It seems to me that the most appropriate protective designation for the approximate 18,000 acres of the upper Gila River area (which roughly includes the upper Gila River, tributaries and surrounding desert area) is WILDERNESS.

Within the next couple of months I hope to spend a few days backpacking the upper Gila River area to record the wildlife diversity observed and to see if I can locate where the Sonoran and Chihuahuan deserts meet.

Sincerely,

Bruce K. Thompson

Bruce K. Thompson
4131 North 23rd Drive
Phoenix, Ariz. 85015

RESPONSE — LETTER 19

19-1 See Response 1-2.

20

19 July 1983

Lester K. Rosenkrance
Bureau of Land Management
425 E. 4th St
Safford, Arizona 85546

Dear Mr. Rosenkrance:

In the Draft Wildeness Environmental Impact Statement prepared by the Safford District BLM the Gila River within the Gila Box is described as the "last free-flowing stretch of the Gila River in Arizona." The proposed wilderness area is described as follows:

> "...running water, rugged and colorful terrain, highly eroded geologic formations, and diversity of plants and animals produce outstanding scenery."
>
> "Opportunities for solitude are outstanding."
>
> "Gila Box WSA offers many opportunites for primitive recreation."
>
> "Riparian vegetation, uncommon in the southwestern U.S., greatly enhances wildlife habitat in the WSA.

The area also contains numerous important archaeological sites, for example, a large prehistoric village is located at the mouth of Eagle Creek.

For all these reasons the Gila Box deserves full protection as a wilderness area and yet it has not been nominated. The no wilderness nomination has apparently been made for two reasons: (1) the possible potential for geothermal development, (2) conflicts with off-road vehicle users.

20-1 Geothermal energy may become important in the future, but the Gila Box, being distant from major urban centers and having high wilderness and cultural values, seems most inappropriate as a major source of geothermal power. The high wilderness and cultural values of the area also make it incompatible with ORV use. The Draft EIS even states that "greater vehicular access could lead to increased vandalism of cultural resources."

As we all know, wild, perennial streams are a scarce resource in Arizona. My personal reaction to the Gila Box was one of delight, that such a lovely area remained in such a pristine state. I strongly believe that, in spite of minor management problems, all 17,831 acres qualify for wilderness.

Sincerely,
Gayle Hartmann
Gayle Hartmann
2224 E. 4th St
Tucson, Az. 85719

RESPONSE — LETTER 20

20-1 A geothermal energy resource is at Gillard Hot Springs within the Gila Box WSA. Studies suggest that the geothermal resource is appropriate for direct source application. See Response 1-2. Cultural degradation has not been a major problem to date from any source of visitation.

21

835 E. Orange Grove Rd.
Tucson, Arizona 85718

July 18, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau Of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

This letter is written in response to the draft environmental impact statement (EIS) for the wilderness designation of wilderness study areas in the Safford District of southeastern Arizona and adjoining lands in Eastern New Mexico.

Public lands that qualify and are designated as wilderness can be viewed as a resource with an expression of worth and value for the following reasons:

1. Clean, unspoiled watersheds.
2. Beautiful and unmared vistas.
3. Vegetation protection, especially riparian.
4. Wildlife protection, including fish, amphibians, reptiles, mammals and birds need undisturbed space to maintain viable populations. This is especially true of rare and endangered species requiring specialized habitats.
5. Cultural. Many additional prehistoric sites could be included with additional acreage.
6. Wilderness recreation. This represents an area where people, especially the young, can develop a feeling of self-sufficiancy and appreciation of the natural character of the land.
7. Livestock grazing will remain intact.
8. Mining. In most cases lands so considered have no or little mineralization of economic worth or value.

The proposed action recommended by the BLM for wilderness designation represents a pitifully low percentage of the total lands involved which are administered by the Bureau. Of the 1.5 million acres only 34,881 or 2.3% are being recommended. Granted, Aravaipa Canyon will doubtless become wilderness shortly with 6670 acres. With this, the total would be 2.8%. The total acreage proposed is extremely disappointing when considering the future potential character change of so much land.

The proposed areas of Needle's Eye, Black Rock, Fishhooks and Happy Camp Canyon are, by themselves, small isolated and irregular pockets or blocks which often do not even follow natural boundries. Additionally, the Gila Box represents one of the few free flowing streams which remain available to recreation for rafting and canoeing in the arid regions of Arizona. It could be unique to the BLM Wilderness System.

For the above mentioned reasons I submit that additional acreage be included to the proposed four or other potential areas. Also, that a portion of the Gila Box be added to your recommendations.

As the west continues to expand potential wilderness areas such as these continue to shrink and often disappear completely. It is only through efforts such as wilderness designation that the natural character of the land will remain for future generations.

Sincerely,
Dan Fischer
Dan Fischer

DF:cmf

22

United States Department of Agriculture
Forest Service
Region 3
517 Gold Avenue, SW.
Albuquerque, NM 87102

Reply to 1950

Date JUL 1 8 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

The staff of the Regional Office, U.S. Department of Agriculture, Forest Service, Region 3, have reviewed the Safford District Draft Wilderness Environmental Impact Statement and have no comments.

Thank you for the opportunity to comment on this well prepared document.

James C Overbay
JAMES C. OVERBAY
Deputy Regional Forester

FS-6200-11(8-80)

23

District Manager, BLM
425 E. 4 th Street
Safford, AZ 85546

19 July 1983

Dear Sir:

The Parrish family , 2 adults & 2 children ages 11 & 12 rafted through the Gila Box in May of this year.
Our initial reason for the trip was to experience a raft ride.
The results were quite different in that the trip was dominated by the river and surrounds instead of the raft.
We saw the Black Hawks which nest in this area and appreciated the lack of roads, vehicles, buildings, and other forms of mans attempt to directly or indirectly change such a beautiful piece of Arizona.

We felt the quiet and solitude of floating down the river, knowing that there would be something new around the bend that was a product of nature and not man (particularly trash).

I can appreciate the ORV effort to have access to this area but I for one am limited in my capacity and ability to carry out their trash. The wild and pristine character of this area must be preserved. There are many other areas available to the group.

Please include this opinion as testimony for your hearings.

Thank you,

Ed Parrish

Edward Parrish
1607 E. Carmen
Tempe, AZ 85283

24

30 Naugler Avenue
Marlboro, MA 01752
July 19, 1983

District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona

Dear Sir:

The purpose of this letter is to offer our comments on the draft environmental statement for the wilderness designation of wilderness study areas in the Safford District.

We believe that the "All Wilderness" alternative is most desirable. We want this designation. We also oppose hunting and trapping in the designated areas. Grazing seems to be unjustly favored.

We totally disagree with the "Proposed Action".

24-1 We urge that U.S.A.F. low-flying aircraft be wholly prohibited from these areas so as to eliminate noise pollution.

Sincerely,

Gail B. Robinson
E.B. Robinson, Jr.

RESPONSE — LETTER 24

24-1 The Wilderness Management Policy (See Appendix No. 2) states that there is no specific prohibition to overflights of wilderness by aircraft. The BLM acknowledges that low-flying aircraft will temporarily disrupt the solitude an area provides. Except in bonafide emergencies, such as search and rescue operations or for essential military training missions, low flights will be discouraged. If low-flying aircraft becomes a problem, BLM will work with the proper military authorities, the Federal Aviation Administration or the pilots of the area in an effort to reduce the disturbance to solitude.

25

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 162ND TACTICAL FIGHTER GROUP (ANG) (TAC)
P.O. BOX 11037, TUCSON, ARIZONA 85734

Reply to Attn of: 162CC

25 JUL 1983

SUBJECT: Environmental Impact Statement

TO: Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Mr. Rosenkrance:

I have had forwarded to me a draft environmental impact statement designating wilderness areas in the Safford/Duncan/Clifton area. Mr. Curtis E. Lueck, Environmental Engineer at Davis-Monthan AFB, forwarded the study to the 162TFG inasmuch as we administer the military training airspace under which wilderness areas 4-22/23/24(B), 24(A), and 4-48 are located.

Two statements in your EIS are of concern to us. The 162TFG conducts all the Air National Guard flying training for the A-7 aircraft. Roughly half of our training is done in the Morenci military training area, which goes from 1500' above ground level to 51,000' mean sea level. (We have a proposal with the FAA to lower a portion of this airspace to 100' above ground level, roughly in the vicinity of wilderness area 4-48.)

The 26th Air Division at Luke AFB also uses this airspace, conducting numerous intercept sorties throughout the area. In total 1982 use, the Morenci MOA was used for 2016 weekday daylight hours during which 5186 sorties were flown.

25-1 Page 23 of your EIS under the noise heading is not quite accurate. From the information listed above, I would have to conclude that the airspace is used more than "infrequently", and is indeed used during most weekday daylight hours, and will continue to be so used.
* I am enclosing a portion of an aeronautical sectional chart which outlines this airspace.

Even though it is stated in the EIS that overflight of a wilderness area is not prohibited, I feel that it is prudent to provide you with more accurate data than your study suggests. Please don't hesitate to call on us at any time for any additional information you may require. The 162TFG is located at Tucson International Airport on Valencia Road. Feel free to contact me or Maj Jim Quick, the unit Airspace Manager, at (602)573-2105.

JOHN M. HARTNETT, Colonel, AZANG
Commander

1 Atch
Aeronautical Chart

RESPONSE — LETTER 25

25-1 See Text, Chapter 3 Noise and Chapter 5 Consultation and Coordination, U.S. Air Force.

*The attachment accompanying this input was not reproduced in this document. It is available for inspection at the Safford District Office.

26

July 23, 1983

To whom it may concern:

I support wilderness ~~desi~~ protection for the Gila Box WSA for several reasons. Wilderness protection would allow animals to move back into areas where the ORV's have been. Protection would also allow revegatation of damaged areas. Finally, wildernes designation would reduce erosion of a valuable resource—soil.

Yours truly,

David Moon

27

July 25,1983

Mr. Lester Rosenkrance, District Manager
Bureau of Land Management - Safford
425 East 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

This letter is being sent in regards to recent hearings for the Safford District BLM Draft Environmental Impact Statement regarding Wilderness Study Areas. It is my wish that this letter be placed on file and in conjunction with these hearings.

A year ago last April (4-6th to be exact) I participated in a Gila river boat trip from Clifton to Safford. This trip passed through some spectacular country, especially the renowned "Gila Box". Needless to say I was delighted to have been able to see the area. Being a geology buff, I was able to have a grand time reconstructing the geological history of the area by reading the stratigraphy of the canyon walls, and studying the types of mountain formations. Admittedly, I know less about the flora and fauna of the area, but that certainly did not dampen my enjoyment of the region.

Aside from geology, archaeology is my first love and so I was understandably delighted to "discover" an untouched Salado site during this trip. There was even a bonus as at the southern base of the terrace on which the site is located, one can find an old historic campsite hidden within the mesquite bosque. It too is presently undisturbed. It is such a pleasure to see archaeological menifestations in pristine condition. It leads me to wonder how many other sites are in this area, and in what condition they might be found?

27-1 It has been brought to my attention that this area has/is being considered for a dam site, and for use by Off-Road Vehicles during times of low water. I am not particularily in favor of a dam, especially within the Box area. Too many scenic places are being destroyed for one reason or another, and with modern technology, dams can be placed anywhere---the scenery is a one shot deal! Off-Road Vehicles should be allowed their place, JUST so long as they stick to those areas. So often with them you give an inch and they have taken a mile. These folks are not nearly as considerate of the landscape as are hikers and river runners, as they tend to mow down plants and leave tremendous amounts of garbage in their wake. Would they be willing to carry out their trash, including the remains of their campfires? I seriously doubt it, but hikers, and river runners do it all the time!!

The Gila Box area is similar to the Desolation Canyon region of central Utah. What is better about the Gila Box is that it is closer to home, but even more important than that, it is one of the remaining sections of a free-flowing stream still found within Arizona. Not only is it a free-flowing section, it is also a nice, safe and easy raft trip for those enthusiasts. It is something that can be enjoyed by young and old alike. This in itself is worthy of preservation. Besides, Arizona is not allowing more water to flow in its now dry river beds, it's creating less!

27-2 I sincerely hope that if this area is opened up and becomes more accessable to the public, that a complete inventory of the total acreage be taken. By this I mean to include flora, fauna, and cultural remains of both prehistoric and historic merit. Before you can determine what impact access will make on the environment, you need an inventory of that environment. I strongly urge that this be done just as a matter of record, whether the acreage becomes wilderness or not. Of course I am holding out for this acreage (and I do mean all 17,831 precious acres) to be included within a Wilderness Area. We will never have enough Wilderness Areas set aside for future generations to enjoy. Let's preserve the natural beauty while we can!

Should you have any questions concerning my statement or about the sites I am aware of, please do not hesitate to contact me. My day phone is 621-4011.

Sincerely,
Sharon F. Urban
Sharon F. Urban (Miss)
2725 North Orchard Avenue
Tucson, AZ 85712

RESPONSE — LETTER 27

27-1 See Response 1-2.

27-2 In every land use planning exercise specific issues arise that must be analyzed. Before these issues can be analyzed and resource decisions made, an adequate inventory/data base must be available from which to make decisions. So much data have been and continue to be collected on the varied resources of the Gila Box (range, wildlife, vegetation, cultural and other resources) in the development of a variety of resource plans and projects.

28

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P. O. BOX 2711
LOS ANGELES, CALIFORNIA 90053

July 26, 1983

IN REPLY REFER TO
SPLPD-R

Mr. Lester K. Rosenkrance, District Manager
Bureau of Land Management
Safford District
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

This is in response to a letter from your office which requested review and comments on the Draft Environmental Impact Statement (DEIS) for the Proposed Wilderness Program for the Safford District Wilderness EIS Area. We offer the following comments:

28-1 a. Page 55, Assumptions: We suggest that subparagraph 7 be deleted in its entirety, because of textual errors, and replaced with the following:

"7. Camelsback Dam, authorized for construction in 1962, may be built in or near Gila Box WSA. The Army Corps of Engineers and the Bureau of Reclamation are jointly studying the upper Gila River Basin to develop a comprehensive plan for flood control and water supply. If current studies determine that Camelsback Dam will be part of the comprehensive plan, more studies such as design and cost will be conducted to select the preferred design. The comprehensive plan will be selected in 1984. Without knowing if a structure will be built or what type of structure it will be, environmental consequences cannot be assessed."

28-2 b. Page 60, Environmental Consequences: Problems or conflicts which may arise from an All Wilderness, Enhanced Wilderness, or Moderate Wilderness designation of an area which includes the authorized Camelsback Dam and Reservoir project, should be addressed in this part of the DEIS.

Thank you for the opportunity to review and comment on this document.

Sincerely,

Carl F. Enson
Chief, Planning Division

RESPONSE — LETTER 28

28-1 See text for changes made to Assumption 7, Chapter 4.

28-2 Based upon Assumption 7, problems or conflicts between wilderness management and the authorized Camelsback Dam are not being assessed in this EIS. This is not a deficiency in this analysis. Ultimately Congress will review this wilderness study and the Corps of Engineers/Bureau of Reclamation study and decide whether wilderness or the Camelsback Dam would be an appropriate use of Gila Box.

29

11061 E. Roger Rd.
Tucson, Arizona 85749
July 19, 1983
749-4248

District Manager
Bureau of Land Management
425 E. 4th. Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

I have reviewed your draft wilderness environmental impact statement received the first part of June. I agree with your all wilderness plan but I think the land in Gila Box 4-22/23/24 (A) should be left open for four wheelers.

I feel that the off road vehicles need somewhere to go especially since there are 5,000 annual recreation vistor days in the Gila Box, or there abouts. If they have an designated area to go this will prevent them from destroying other land and areas.

29-1 If your environmental impact statement makas it through Congress I personally feel you should consider making some hiking trails. I live in Tucson and have hiked most of the trails around and I would like to see some new trails for hikers to use.

This is in reference to your letter of June 1983 reference 8500. If it is at all possible I would like your environmental impact statement covering section 3 as this is also an area I'm active in also with hiking and hunting.

Sincerely,

JACK L. JARVIS
11061 E. Roger Rd.
Tucson, Arizona 85749

RESPONSE — LETTER 29

29-1 Additional hiking trails in BLM areas designated wilderness will be addressed in the wilderness management plan developed for each area. Through these plans BLM will, with active participation by the public, address the need for hiking trails, their location, construction and maintenance.

30

Safford, Arizona
July 21, 1983

Ben P. Snure, Jr.,
Warner B. Mattice,
Alan Day,
Terry McEuen, and
Wilford Claridge,
Grazing Advisory Board Members,

and

Lester K. Rosenkrance, District Manager
Safford District BLM.

Re; Wilderness Designation

Gila Box 4-22/23/24 (A)

Turtle Mountain 4-22/23/24 (B)

Dear Board Members and BLM District Manager:

This is to advise that I wish to appear before the Grazing Advisory Board on Friday, August 26, 1983, in order to answer any questions regarding the Gila Box and Turtle Mountain. It would be appreciated if you would facilitate my appearance.

30-1 I have already furnished the BLM and the Board of Land Appeals with statements and reasons why I feel that the Gila Box and Turtle Mountain should not be considered at this time for designation as Wilderness areas. With this letter I wish to incorporate all the information previously furnished regarding this matter.

In addition, I am submitting the following additional material that may be helpful.

Your assistance and help in this matter will be greatly appreciated.

Sincerely yours,
Ruskin Lines
Ruskin Lines
915 Stratton Drive
Safford, Arizona 85546

WILDERNESS DESIGNATION IMPACT UPON THE MINING TRIANGLE

The Gila Box and Turtle Mountain are in the mining triangle consisting of the Phelps Dodge Corporation mining operation at Morenci; the future mining operation in the Sanchez District by the Inspiration Consolidated Copper Company; the future mining operations in the Safford area by the Phelps Dodge Corporation and by the Kennecott Copper Company.

It is respectfully suggested that 10,000 people live in Greenlee County, Arizona, solely because of the Phelps Dodge Corporation mine at Morenci.

The future economic impact of copper production in the Safford, Arizona, area can be measured only in multiple millions of dollars.

The EIS at page 38 accurately states, "The area, however, cannot be readily dismissed as having no mineral potential because it lies between Arizona's largest open pit mine and a relatively recent discovery of a district estimated to have over a billion tons of copper ore."

It is respectfully suggested that the Gila Box and Turtle Mountain should not be considered as targets for Wilderness designation for either one or both of the following reasons;

(1) The presently existing mining industry, and the future certainty of mining in the mining triangle should not be jeopardized by designating either one or both of these areas as Wilderness.

It is reasonably predictable that an active environmentalist, visiting either the Gila Box or Turtle Mountain, and after viewing the invading smelter smoke and after smelling the acrid fumes, would say, "Why do they permit a copper smelter to operate so near to a designated Wilderness area?", and then the active environmentalist would conclude by saying, "We must do something. We must shut down the copper smelters". It is reasonably predictable that litigation in the courts may follow such a Wilderness designation.

30-2 (2) Wilderness designation would prohibit mineral exploration within the Gila Box and on Turtle Mountain. These areas need to be appropriately drilled and tested before being seriously considered for a Wilderness designation. Only after being found to be barren of economically feasible mineralization, should these areas be considered for a Wilderness designation.

WILDERNESS DESIGNATION IMPACT UPON THE GRAZING OF LIVESTOCK

30-3

The Gila Box and Turtle Mountain areas include areas that need to have additional water facilities developed. Additional water will provide for better utilization of the available forage, and will probide for better utilization of this resource.

Designating these areas as Wilderness will restrict or foroclose;

(1) The development of needed water projects such as the construction of additional earthen reservoirs, pump projects, and wells;

(2) The development of stock handling facilities such as corrals and loading chutes;

(3) The development of additional roads for the multiple-users; and

(4) The development of integral units, which will permit in due time the establishing of rotational pastures for the livestock. These pastures will provide for more desirable and better utilization of this resource.

TURTLE MOUNTAIN IS INAPPROPRIATE AS A WILDERNESS SITE

It is respectfully suggested that Turtle Mountain is not particularly dissimilar than thousands of acres in the Southwestern part of the United States. It is suggested that an appropriate examination of the area will reveal that it does not qualify for Wilderness designation under the guidelines outlined by the United States Congress.

It is respectfully suggested that if the Safford District Grazing Advisory Board is considering any affirmative action regarding Turtle Mountain that the members of the Advisory Board personally inspect Turtle Mountain. In this connection, for the particular assistance of the Safford District Grazing Advisory board, the following comments are being made regarding some of the photographic reproductions that are found in the Environmental Impact Statement.

* * * * * * * * * * * * * * * * * *

PAGE 31

The EIS contains a photographic reproduction on page 31 with the following caption, "The cliffs and rock outcrops of Hot Springs Canyon are typical of the canyons of Turtle Mountain WSA that drain eastward to Eagle Creek".

Comment

It is not possible for me to determine where the photographer stood when he took the photograph, although it is suggested that he may very well have been standing on patented land owned by Ruskin and Jeana Lines at the time that the photograph was taken.

The top portion of the area that is depicted and which is described as cliffs and rock outcrops are principally if not entirely located on land that is privately owned by the Morenci Water & Electric Company and on land that is not part of the Wilderness Study Area. Many miles of Eagle Creek, extending from the mouth northward, are owned by the Morenci Water & Electric Company and this area is not part of the Wilderness Study Area.

* * * * * * * * * * * * * * * * * * *

PAGE 78

The Environmental Impact Statement contains a photographic reproduction on page 78 with the following caption, "The view southwest from Bellmeyer Saddle along the Safford - Morenci Trail in Turtle Mountain WSA offers a magnificent panorama of the Gila Mountains".

Comment

The photographic reproduction is described as "in Turtle Mountain WSA". It is not possible for me to determine where the photographer stood when this photograph was taken. Possibly he was standing on BLM land, and possibly he was standing on land that has been designated as a part of the San Carlos Apache Indian Reservation.

The statement "along the Safford - Morenci Trail" could refer to one of several trails that were used on the route from Safford to Morenci. The trail passing through Bellmeyer saddle must cross a finger of land which is a part of the San Carlos Apache Indian Reservation. Obviously, passage along this trail could be terminated at any time by action of the San Carlos Apache Indian Tribe, and if this action was taken by the Indian Tribe then traversing this trail would no longer be possible.

The tenuous, uncertain use of Bellmeyer saddle, which is a part of the San Carlos Apache Indian Reservation, it is respectfully suggested clearly disqualifies the area in and around Bellmeyer Saddle for any further consideration as a Wilderness Area.

* * * * * * * * * * * * * * * * * * * *

PAGE 62

The Environmental Impact Statement contains a photographic reproduction on page 62 with the following caption, "Trujillo Canyon and its tributaries drain a large area in the center of Turtle Mountain WSA".

Comment

This photographic reproduction correctly depicts Trujillo Canyon. The viewer is invited to examine the photograph and to decide if there is something so distinctive that this area can be qualified for a Wilderness designation.

The center portion of this photographic reproduction is a picturization of the 160 acres of privately owned land presently owned by Ruskin and Jeana Lines.

* *

CONCLUSION

30-4

The three photographic reproductions found on pages 31, 78, and 62, dramatically illustrate the problem cited at page 61 of the EIS with this quotation, "Turtle Mountain WSA includes three private inholdings and one state inholding for which vehicle access could be requested and would have to be granted. " (Emphasis added by underlining.)

To permit a Wilderness designation would create a confrontation between the owners of the private land and the users of the Wilderness area.

Effective management and control of the area would be impracticable because of the significant areas that cannot be controlled or managed as a Wilderness.

ENHANCED WILDERNESS DESIGNATION OF TURTLE MOUNTAIN

Such a proposed designation, it is respectfully suggested can and should be summarily dismissed with the simple statement that there is no significant or qualifying area that can be designated.

The Enhanced Wilderness area would consist of nothing more than the heads of several canyons with no significant qualifying Wilderness characteristics.

Traversing the heads of these canyons from North to South would be difficult. Definite boundary lines would be very difficult to determine.

DESIGNATION OF GILA BOX AS A WILDERNESS

30-5 It is my understanding that the construction of a dam at the Camelback site has been approved by the Congress of the United States of America. It is my understanding further that funding for the construction has not been approved.

It appears reasonable that flood control structures of some kind will in due time be constructed on the upper Gila River watershed.

Until a definite construction program is funded and approved the Camelback site must be considered as a possible construction site for a flood control structure.

The posture of this situation at the present time should, it is respectively suggested, eliminate the Gila Box as a possible Wilderness area.

30-6 **It is respectfully suggested further, that the existing road on the White Mesa disqualifies a portion of the proposed area as a Wilderness site.**

RESPONSE — LETTER 30

30-1 All of the statements and reasons previously furnished to BLM and Interior Board of Land Appeals are not reproduced in this document. This material was provided to the district at various stages of the inventory process and was responded to at that time. The comments and responses are on file at the Safford District Office and are available for public review. This response will not address that input.

30-2 Section 603(a) of the Federal Land Policy and Management Act states:

> That prior to any recommendations for the designation of an area as wilderness, the Secretary shall cause mineral surveys to be conducted by the Geological Survey and the Bureau of Mines to determine the mineral values, if any, that may be present in such areas.

Mineral surveys will be conducted only on those areas recommended preliminarily suitable for inclusion in the National Wilderness Preservation System. The surveys will be completed before the State Director forwards his recommendation. A suitable wilderness recommendation could change as a result of the mineral survey findings.

Section 4(d)(2) of the Wilderness Act states that prospecting or other activities for the purpose of gathering information about minerals or other resources can occur, if the activity is carried out in a manner compatible with preservation of the wilderness resources. This section of the Act further states that such areas will be surveyed by the Geological Survey and Bureau of Mines on a planned, recurring basis, consistent with wilderness preservation, to determine mineral values that may be present.

30-3 The BLM Wilderness Management Policy and Section 4(d)(4)(2) of the Wilderness Act provide for continued livestock grazing where it was established prior to designation of an area as wilderness. The objective of livestock management in wilderness is to utilize the forage without degradation of the wilderness or range/forage values. Construction of livestock waters in wilderness is permitted if necessary for the effective management and protection of the resources.

30-4 The Wilderness Management Policy (See Appendix No. 2) states that owners of land completely surrounded by wilderness shall be given such rights as may be necessary to assure adequate access to their land. Adequate access is defined as the combination of routes and modes of travel that will, as determined by BLM, cause the least lasting impact to the wilderness resource while serving the reasonable purposes for which the State or private land is held or used.

30-5 See Response 4-1.

30-6 The vehicle route on White Mesa has been determined to be a vehicle way and not a road. It does not disqualify the White Mesa area from wilderness study.

31

25 July 83

District Manager
BLM
425 E. 4th
Safford AR 85546

Dear Sir:

The following are my comments and response to the Safford District DEIS on Wilderness Study Areas.

"I agree with the proposed actions for these areas:

Needles Eye
Black Rock
Fishhooks
Peloncillo Mountains
Happy Camp Canyon

However, I substantially disagree with the Proposed Actions for the rest of the WSA's. Area by area responses follow.

31-1 DAY MINE: I support the Enhanced Wilderness alternative (11,870 acres) for this area. The area is proposed for no wilderness" because of low wilderness values and presence of higher wilderness values in nearby Fishhooks WSA." This is insufficient in itself to disqualify the area by itself. Each area should be judged on its own merits.. Furthermore, according to the DEIS over

2

31-1 Day ~~Box~~ Mine has "outstanding opportunities for solitude..." (p.29) and "important scenic & wildlife values" (p.29). This does not differ in description from the Fishhooks WSA. What goes on here? There is no (or very little) mineral potential, and only slight inholding problems, even under the All Wilderness designation. And none of these are identified as reasons for the Proposed Action. Furthermore the Enhanced Wilderness proposal "... excludes... lands of lesser wilderness quality..." (p.59). Finally the WSA includes a vegetation type not found in the NWPS. On the basis of the DEIS I can only conclude that the BLM is not making a decision based on its own findings. Enhanced wilderness is ~~the~~ the alternative that is justified by the DEIS.

31-2 GILA BOX WSA: This WSA is excluded from wilderness designation"... because of conflicts with ORV use..." (p.17). This decision is not justified by the DEIS. I support the Enhanced Wilderness designation (15,272 acres) or the Moderate Wilderness proposal (10,192 acres). The ORV issues is a straw dog. The DEIS states that "... use is expected to shift to other areas, reducing the overall economic impact." (p. 80). And "Wilderness designation of Gila Box WSA might have a slight adverse impact on the local economy." (p. 80). This is hardly substantial evidence to support the proposed action!! How about the balancing effects of increased use by other recreationists (non-motorized)? This would further reduce the "slight" economic impact. There are only so many areas that are WSA quality. The DEIS states that ORV use would shift to other areas. Which use is more

-3-

31-2 important. ORV use in a rare WSA or ORV use that can easily shift to another non-WSA area nearby? This is not sufficient justification for a no wilderness proposed action. This faulty logic makes me angry. I feel the BLM is not being honest in placing a higher value on a use that can be moved to another area while not supporting wilderness that only exists in one specific location. Both Enhanced and Moderate Wilderness would decrease ORV conflicts. One of the above should be the proposed action.

31-3 TURTLE MOUNTAIN: I support Enhanced Wilderness for this WSA. The DEIS lists low wilderness values, inholdings/access, and grazing problems as reasons for the no wilderness proposed action. As for "low wilderness values", there is no evidence to support that conclusion in the DEIS which describes this WSA as having "outstanding opportunities for solitude." (p. 32). Considering that the Enhanced Wilderness alternative cuts acreage by one half it seems this is a non-supportable reason. Inholding and access are non-supportable reasons ~~for~~ by the same logic. The one remaining state inholding has been identified "... for acquisition through exchange". (p. 62) by the BLM. This renders inholding/access as a non-reason for lack of wilderness designation. The grazing issue is the most important one on Turtle Mt. WSA. The DEIS states that wilderness designation "... would have a moderate adverse impact to the local rancher," "... (but) "... adverse impacts to the area's economy would be slight." (p. 80). These values forgone are stated as being "... 4% of existing values." (p. 80). I would disagree that this is sufficient impact to warrant exclusion

-4-

31-3 The improvements are *planned* which is not emphasized in the DEIS. They are not *existing* uses. Obviously the range is being grazed profitably now. Such use could continue with wilderness designation. There is not enough info provided by the DEIS to determine how much improvements are *critical* to range use.

31-4 JAVELINA PEAK: I support Enhanced Wilderness (7,035 acres) for this WSA. Reasons for non wilderness designation are "... because of low wilderness values and conflicts with ORV use." (p. 17). This reasoning is contradicted on p. 63: "Enhanced Wilderness would designate higher quality wilderness lands and eliminate most problems of ORV use." Further (p. 63)" Enhanced Wilderness would avoid many of the "... "problems expected" ... including," ... " ORV use in the dunes and most ORV use of boundary roads and the cherrystem road." On p. 72 on the ORV use chart it is stated that ORV use would be banned from the foothills of the Whitlock Mts. There is no reference to ORV use ever occuring there!! It is only mentioned in areas *excluded* "from wilderness designation under Enhanced Wilderness. There is no reason for BLM not to support Enhanced Wilderness.

In summation I support Enhanced Wilderness for

- Day Mine
- Gila Box
- Turtle Mts.
- Javelina Peak
- This would add 43,281 wild. acres to the DEIS.

In reviewing my comments I am very disturbed to...

see BLM, for no justifiable reasons, abandoning the Enhanced Wilderness choice. As I have labored to outline there is little justification, with the possible exception of Turtle Mt due to grazing, for this stance. Some very flimsy support is thrown up against the Enhanced Wilderness designation. So much so that I am unhappy and demand a response to my comments. I feel that wilderness has been given short shrift with nothing but hazy facts and misrepresented conclusions.

I await a quick response.

Sincerely,
Ed Grumbine
Wilderness Studies
UNEX
Santa Cruz, CA 95064

RESPONSE — LETTER 31

31-1 In the wilderness study process, BLM was required to evaluate the quality of the WSAs' mandatory wilderness characteristics: size, naturalness and outstanding opportunities for solitude and primitive recreation. Through the inventory process, completed in November 1980, the Safford District determined that Day Mine WSA did possess the required wilderness characteristics. However, wilderness characteristics may be present in WSAs to varying degrees. Therefore, BLM concluded that the wilderness values of the WSA were not so outstanding that they deserved wilderness status.

The Wilderness Study Policy (BLM 1982c) states that if comparisons between WSAs are made, the rationale for the comparison and the specific methodology used must be documented. The policy further states that arbitrary assignments and/or subjective ratings or rankings should not be used in a wilderness study. Since it can be argued that the comparison the EIS made between this WSA and the neighboring Fishhooks WSA was not consistent with policy, BLM reconsidered the analysis and their recommendation. However, in careful reconsideration of the recommendation in the draft EIS, the district still does not feel the WSA contains such outstanding wilderness values that it merits wilderness status. The WSA does contain the necessary size, natural values and outstanding opportunities required by the Wilderness Act and BLM inventory procedures. However, there are no unique or unequaled resource values present that demand wilderness status to ensure their continued existence.

The vegetation type found in this WSA is also present in the Fishhooks WSA that has been recommended for wilderness designation. Despite the fact that there are very few conflicts with wilderness management in the Day Mine WSA, BLM findings lead to a non-wilderness recommendation. As stated in the EIS, wilderness values would be minimally affected by this recommendation.

The BLM State Director submitted his preliminary wilderness recommendations to the BLM Director in Washington, who made a recommendation to the Secretary of the Interior. This Final Environmental Impact Statement represents the Secretary's recommendation to the President as to the suitability or nonsuitability of each Wilderness Study Area (WSA) for preservation as wilderness. The President in turn will transmit his recommendation to Congress. After appropriate consideration, Congress will accept, reject or modify the President's proposal. Only Congress can designate an area as wilderness, and only Congress can release a WSA from its study status.

Public participation provided both the opportunity and encouragement for the public to express its views and played an important role in the BLM's decisionmaking. Consideration of public concerns, values, and preferences as well as the desires of local, state, and national interests were carefully weighed against other considerations. With competing public objectives, wilderness suitability is a question of values. The amount of land recommended as suitable or non-suitable depends on the relative weights assigned to economic development and to preservation of resource values.

We believe our wilderness recommendations are balanced and rational. In arriving at our decision, serious consideration was given to public input, environmental values and effects, economic and technical considerations, national policy and our statutory mission.

31-2 See Response 1-2.

31-3 Turtle Mountain WSA has the required wilderness characteristics. However, the natural quality of the WSA is considered low because the WSA has reached its limit of allowable evidence of man's work. There are so many existing imprints that cumulatively the WSA contains the maximum evidence of man to still retain its natural character.

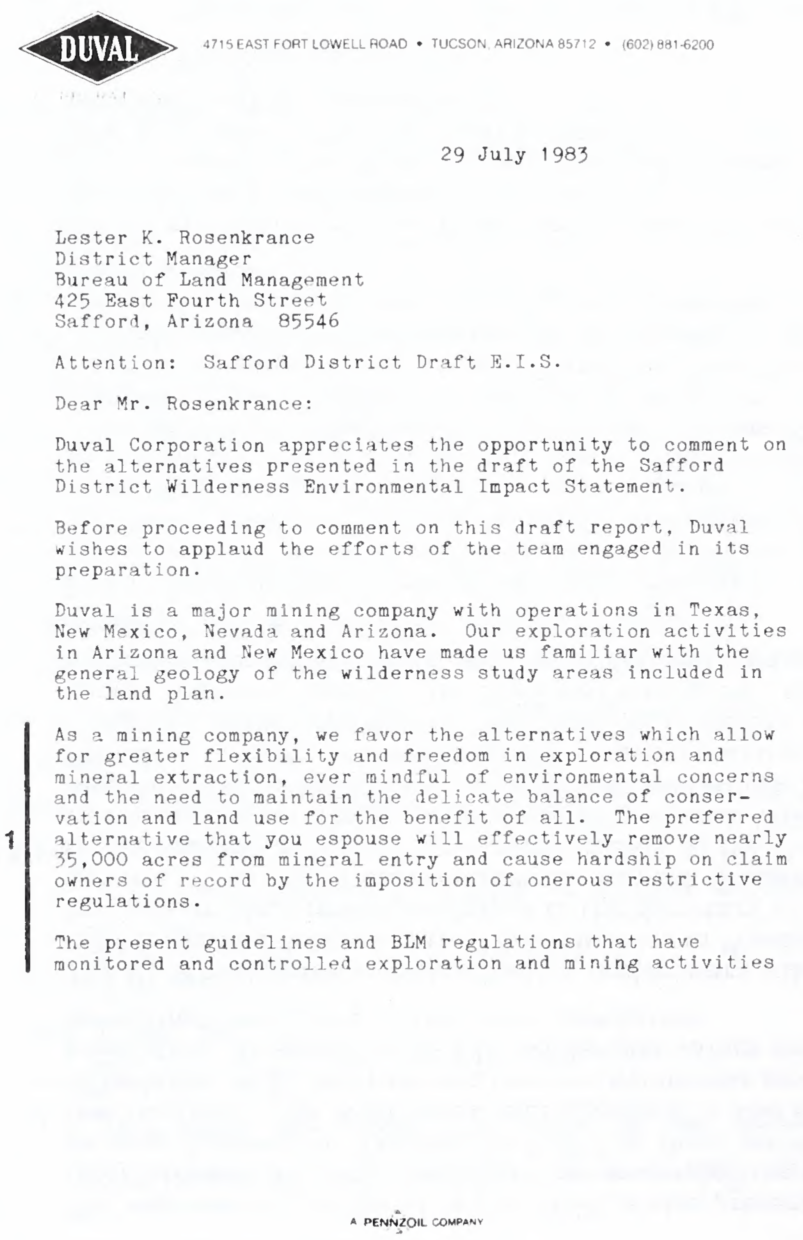
Access to state or private inholdings must also be carefully considered in making a wilderness suitability recommendation. While the EIS does identify our desire to acquire state section 32, we are required to provide reasonable access to inholdings. Vehicular access to inholdings would have an adverse effect on the wilderness character of this WSA. If BLM cannot deny access, it cannot ensure preservation of the area's wilderness character in the long term.

The planned livestock improvements are important for proper resource management. Currently, livestock use is poorly distributed throughout the allotment. Livestock are using the canyon bottoms heavily with little to no use on the steep side slopes and ridgetops. Heavy livestock use in canyon bottoms has been shown to have adverse affects on vegetation, soils, wildlife and water. Our desire is to properly distribute livestock throughout the allotment. In order to implement a grazing system and end overuse of the drainages, additional waters and fences are needed. Since the WSA contains the maximum amount of evidence of man to still retain its natural character, further livestock improvements would cause the WSA to become unnatural in character. See the Range section of Chapter 3 for further information on the purpose of the livestock improvements.

31-4 The *Enhanced Wilderness* alternative would eliminate most of the ORV use problems and the lands of lower wilderness quality. However, the Bureau does not feel Javelina Peak WSA contains such outstanding wilderness values that the area merits wilderness status. Like the Day Mine WSA discussed in Response 31-1, the WSA does possess the necessary wilderness characteristics. The WSA is large enough, the evidence of man is not the dominant feature on the landscape, and outstanding opportunities for solitude and primitive recreation exist. But BLM does not feel there are any resource values so unique or unequaled that wilderness designation is warranted. The EIS points out that much of the WSA consists of gently rolling lowlands rising abruptly to the rugged Javelina Peak. The vegetation type is desert shrub, mesquite and creosotebush, common in southeastern Arizona. While the WSA does contain vegetated dunes, only about one-third of the 4,000-acre dune area lies within the WSA. The WSA is described as mostly in natural condition. So, while the WSA contains the required wilderness characteristics, BLM does not feel they are so outstanding they merit wilderness designation.

Management of the dunes and fossil remains has been and will continue to emphasize protection of these resources. As the EIS states, wilderness values are expected to be minimally impacted under the *No Wilderness* alternative.

32



DUVAL 4715 EAST FORT LOWELL ROAD • TUCSON, ARIZONA 85712 • (602) 881-6200

29 July 1983

Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 East Fourth Street
Safford, Arizona 85546

Attention: Safford District Draft E.I.S.

Dear Mr. Rosenkrance:

Duval Corporation appreciates the opportunity to comment on the alternatives presented in the draft of the Safford District Wilderness Environmental Impact Statement.

Before proceeding to comment on this draft report, Duval wishes to applaud the efforts of the team engaged in its preparation.

Duval is a major mining company with operations in Texas, New Mexico, Nevada and Arizona. Our exploration activities in Arizona and New Mexico have made us familiar with the general geology of the wilderness study areas included in the land plan.

32-1 As a mining company, we favor the alternatives which allow for greater flexibility and freedom in exploration and mineral extraction, ever mindful of environmental concerns and the need to maintain the delicate balance of conservation and land use for the benefit of all. The preferred alternative that you espouse will effectively remove nearly 35,000 acres from mineral entry and cause hardship on claim owners of record by the imposition of onerous restrictive regulations.

The present guidelines and BLM regulations that have monitored and controlled exploration and mining activities

A PENNZOIL COMPANY

in the past are certainly adequate to manage those public lands for multiple use. To designate Needle's Eye, Black Rock, Fishhooks and Happy Camp Canyon as wilderness areas will bar that segment of the public, the rancher, the prospector and the mineral developer, from the benefit of our public lands.

Thank you for soliciting our comments.

Sincerely,

Joseph L. Kirby

Joseph L. Kirby
Manager-Land Department

JLK:mjk

RESPONSE — LETTER 32

32-1 In land use planning the purpose is to determine the most appropriate use or combination of multiple uses of the public lands. In this wilderness study BLM followed this planning process and recommended wilderness management (one of the recognized multiple uses) in four areas totalling approximately 38,672 acres. This recommendation, like any resource decision, is not without impacts. Some are adverse and some are beneficial. The Bureau believes its decision is rational.

For further insight into wilderness management and BLM recommendations see: Responses 16-2, 30-2 and 31-1.

33

3541 N. Olive Road
Tucson, AZ 85719
August 1, 1983

District Manager
BLM
425 E. 4th Street
Safford, AZ 85546

Dear Sir:

I am writing regarding the proposed wilderness designation for 17,831 acres of the Gila Box. I have been told that the BLM proposed to deny this wilderness designation because of conflicts with ORV use in the canyon bottoms.

I participated in a float trip through the Gila Box with Thor Lane in 1982, and it was one of the most peaceful, thoroughly natural experiences I have ever had, without any encounters with other people or signs of other people. Since opportunities for such experiences are rare, I feel that it is imperative that we save what few wilderness areas we have left. ORV users have many places for their recreation which do not destroy existing wilderness areas, and I feel that we must keep them out of wilderness areas.

Thank you for thoroughly considering this issue in an impartial way.

Sincerely,

Elizabeth Abbey

Elizabeth Abbey

34

August 2, 1983

District Manager BLM
425 E. Fourth Street
Safford, Arizona 85546

Dear Sir,

There are not many places in Arizona where one might enjoy a water related wilderness experience. It seems routine to have to contend with motor powered boats and ORV's when one wishes to paddle or row to some remote spot seeking peace and quiet. That is why I feel so strongly about the Gila Box and the need to maintain it in a wild and unspoiled condition.

34-1 I don't see any reason why all 17,831 acres of this area should not be managed as wilderness with no intrusions by motorcraft or ORVs. When was the last time you went outside and did not hear the sound of motors? It is a rare occasion these days isn't it?

I love the peacefulness, the quietness, the solitude, and the rejuvenation of my spirits that the Gila Box can provide. All 17,831 acres qualify for wilderness designation - such a small area to provide such abundant returns! Let's do it - wilderness for the Gila Box. Thank you.

James E. Posedly
P.O. Box 411
Oracle, AZ 85623

RESPONSE — LETTER 34

34-1 See Response 1-2.

35

Mr. & Mrs.
Rudolf Dankwort
8121 North 8th Ave.
Phoenix, AZ 85021

ARIZONA STATE OFFICE
BU LAND MANAGEMENT
JUL 21 '83
SO ASD
PUB AFF
ESO
RESOURCES
MINERALS
OPERATIONS
ADMIN
TRNG CNTR
FLAGSTAFF
CENT FILES
ACTION

Senator Barry M. Goldwater
Washington, DC 20510

Dear Senator Goldwater,

I urge you to oppose the Bureau Of Land Management's irresponsible efforts to destroy one of the few remaining natural desert river systems, that of the Gila and San Francisco rivers in Eastern Arizona and Western New Mexico.

On a rafting trip last March,with Congressman McBain et al, Bud Bristow, Director of Arizona Game and Fish declared the area to be of "irreplaceable singularity". And Dr. Robert Witzeman of Maricopa Audubon pointed out the rich and varied riparian nesting bird population.

The BLM's position is simply outrageous; (1) rejection of wilderness status, (2) cost-ineffective dam building and (3) carte blanche to off-road "wreck-reational" vehicles to damage the area as quickly as possible to justify (1) and (2). Moreover, the ostensible reason for the dams, to raise cotton and feed grains, is absurd in light of their perennial surplus.

When will we realize what precious and potentially valuable tourist attractions these few remaining places are? One prominent Arizona has already admitted the folly of Glen Canyon dam.

Must it always be too late?

Yours very truly,

Ruddy Dankwort
Rudolf Dankwort

36

5122 East Citrus Street
Tucson, Arizona 85712
August 8, 1983

Lester K. Rosenkrance, District Manager
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

We would like to comment on the BLM alternatives in wilderness management.

If we had our way we would pick the alternative of "All Wilderness" designating all nine WSA's (131,820 acres) as wilderness. Wilderness is of utmost importance to us and we figure you have already taken away 168,180 acres from the original roadless areas under consideration. We believe all that's left now should be wilderness — too much roadless area has been removed from consideration already.

We see no reason for excluding Day Mine, since most of its 16629 acres are in natural condition and it offers wonderful opportunities for solitude.

Gila Box should positively be wilderness, all 17,831 acres. The area is mostly natural and requires protection because of the rare free flowing stretch of the Gila River and the also very rare bald eagles that winter there. If any area deserves wilderness protection, this Gila Box does. ORV's have plenty of other places to roar around in!

36-1 Turtle Mountain is being excluded for insufficient reasons. The area is generally natural, human imprints mostly unnoticeable because of vegetation or topography and it is a large area, wonderful for solitude. The area should remain with no developments because of its importance for raptor nesting.

Javelina Peak, also, is large enough and wild enough to provide wilderness solitude. The area is natural with vegetation and topography also screening most human imprints. Most ORV use is outside the WSA in the dunes or on boundary roads. Let's protect all the rest, at least.

Peloncillo Mountains should be wilderness. The rugged terrain offers solitude. The area is mostly natural and the few human imprints are not very visible. The beautiful scenery of this area should be protected.

We believe it is important to protect as much land as possible right now before further exploitation occurs. The people are using the wilderness more every year — it is necessary for humans to have wild places for solitude.

Sincerely,
Walter + Dorothy Pelech

RESPONSE — LETTER 36

36-1 The non-wilderness recommendation is based on conflicts with livestock management, potential for geothermal energy, problems with access to inholdings and low quality wilderness values in the WSA. All these reasons led to the conclusion that the resource values of this area would be more appropriately managed without wilderness designation. Response 31-3 provides further explanation of these issues.

37

7 Aug 1983

Dear Sirs

I'm writing in regard to the Gila Box area and its status as a wilderness area. Last year I had the good fortune to float the Gila through this area and from this experience I certainly feel the area should be considered as a wilderness. During this trip we camped at the junction of Eagle creek and there were signs of a long abandoned indian village on the bluff above the river. I was also aware of the destructive effects of vehicles which apparently use the river bed as a road

Roger

38*

August 3, 1983

Bureau Land Management
Safford, Arizona 85546

Dear Sirs;

I would like to express my approval on your decision to delete most of the proposed wilderness areas in your district.

I am a public land user and do not think it is to the best interest of the public to have that many wilderness areas.

Sincerely,

Joe Alder
Pima Arizona

*Identical letters were sent by five separate individuals.

39*

August 3, 1983

Mr. Lester Rosenkrance
District Manager
Bureau Land Management
Safford, Arizona 85546

Dear Sir:

I would like to take this opportunity to express my approval of your decision to delete most of the proposed wilderness areas in your district.

It does not serve the public interest to tie up large tracts of land for only one use.

Sincerely,

40

AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

August 5, 1983

Mr. Lester K. Rosenkrance
Bureau of Land Management
Safford District Office
425 East 4th Street
Safford, AZ 85546

Re: Safford District Draft Wilderness EIS

Dear Mr. Rosenkrance:

Atlantic Richfield Company appreciates the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the wilderness designation of wilderness study areas in the Safford District. We concur with BLM's preliminary recommendation that Arizona WSA 4-60 Peloncillo Mountains be designated as non-suitable for wilderness designation and remain open to energy and mineral development.

Thank you for this opportunity to comment on the draft wilderness assessment. Please contact this office if we can be of further assistance in this matter.

Sincerely,

Jay R. Mitchell

J. R. Mitchell
JRM:BC:drm

---

*Identical letters were sent by 66 separate individuals.

41

Lester Rosenkrance, Safford District Manager
Bureau of Land Management
425 E. 4th ST.
Safford, AZ 85546

10 Aug 83

Dear Mr. Rosenkrance:

Please enter this letter as part of your official hearing record on your draft Environmental Impact Statement (DEIS) of your Wilderness Study Areas (WSA).

I've been an admirer and explorer by self-propelled means of southwestern areas for the past five years. During this time I've observed a rapidly diminishing supply of riparian areas and, I'm greatly concerned about the future of these unique places. In particular I would like to voice my support for the 17,831 acre Gila Box Wilderness.

41-1 Your proposed action regarding the Gila Box Wilderness would not designate this area as wilderness "because of conflicts with ORV use in the canyon bottoms" (p.17). However on page 80 you state "realistically, however, ORV use would probably shift to other areas, reducing the overall impact to the local economy". But again on page 79 your conclusion is "none of the alternatives would have significant regional economic impacts". I find these statements regarding the Gila Box Wilderness very conflicting and supporting only one recreational group, the ORVers.

I have found this area highly significant for its wide variety of animal species, especially as critical habitats for the black hawk and peregrin falcon. This area also affords the opportunity of a riparian area for backpacking during the summer and fall months. Also for me this area provides a significant river rafting experience, safe and gentle, without the large investment in equipment necessary for other rivers.

I seek a wilderness area for solitude, exploration and admiration of nature. The inclusion of ORV use is such an area is significantly detrimental to my mental state and my enjoyment of a natural environment. In the face of a rapidly increasing population within the State of Arizona and the resulting demands on the land, it is necessary to preserve such areas as the Gila Box Wilderness as a heritage for future Arizonans in view of the area's uniqueness to the state.

I do not feel district or state administration is sufficiant for the Gila Box Wilderness given its national significance.

Respectfully,
Wendy E Thon
Wendy E. Thon
Box 409
Cortaro, AZ 85230

RESPONSE — LETTER 41

41-1 The passage you cite on page 17 of the draft EIS describes the *Proposed Action* for the Gila Box WSA and why it was not recommended for wilderness designation. The passages you cite on pages 79 and 80 address local and regional economic impacts of wilderness management. The statements are related but not conflicting. The passage on page 17 states that the *Proposed Action* is for no wilderness because wilderness management would conflict with ORV use in the river canyon. The statements on pages 79 and 80 address the economic impacts that would be anticipated to the local and regional economies if wilderness management were implemented.

42

Southern California Edison Company

P.O. BOX 4[illegible]
[illegible] LONG BEACH BLVD.
LONG BEACH, CALIFORNIA [illegible]

C. J. LOWERISON, JR.
MANAGER
OF
RIGHT OF WAY AND LAND

August 8, 1983

Bureau of Land Management
425 East 4th Street
Safford, AZ 85546

Attention: District Manager
Safford District

Gentlemen:

SUBJECT: Arizona; Safford District Draft
Environmental Impact Statement
Proposed Wilderness Areas

Southern California Edison Company appreciates the opportunity to comment on the above subject DEIS.

42-1 Based on our review of the DEIS and our current information, it appears that three proposed WSA's conflict with the boundaries of planned corridors as disclosed by the Western Utility Group's 1980 Western Regional Corridor Study.

The three WSA's are identified as follows:

1) Gila Box, parcel 4-22/23/24A.
2) Turtle, parcel 4-22/23/23/24B.
3) Peloncillo, parcel 4-60.

Our review of the DEIS also disclosed that the above three proposed wilderness areas are recommended by the BLM as non-suitable for designation as wilderness. The Southern California Edison Company supports this recommendation. Such a designation would protect and preserve the integrity of the planned corridors in these areas.

Thank you for inviting us to review the DEIS. We hope that you will give the above comments your full consideration before finalizing the EIS. If further details are needed, please contact Mr. R. B. Pitts at (213) 491-2987.

Very truly yours,

C. J. Lowerison, Jr.

3398/fedpermt

RESPONSE — LETTER 42

42-1 Through consultation with Southern California Edison Company, the Salt River Project and Mountain Bell, BLM confirmed that the boundaries of the three WSAs did not conflict with the boundaries of utility corridors disclosed in the Western Utility Group's 1980 Western Regional Corridor Study.

43

St. Gregory high school
p.o. box 12665, tucson, arizona 85732

August 8, 1983

District Manager
425 E. 4th St.
Safford, AZ 85546

Dear Sir:

In early April I and a group of students took a raft trip down the Gila River through what is called the Gila Box. The trip was intended to be for pleasure, but it turned out to be very much more. The richness of the area in terms of wildlife and natural history plus the addition of a prehistoric indian site turned the trip into an informative educational experience.

I have kayaked the Grand Canyon, Cataract Canyon, the Yanpa and Green Rivers through Dinosaur National Park, plus many smaller streams in the west. The Gila Box, although hydrologically tame compared to others, possesses its own personality of serenity and natural beauty that is as impressive and important as the Grand Canyon. The Gila Box can serve as a personal retreat from the cacophony of urban and mechanized life, as well as being an educational field school.

While we were on the river, a black hawk flew within twenty yards and directly overhead. We saw a lizard that is rarely seen this far north. We saw a geologic record that told of tortuous past events and we felt glad we could be seeing it from the silent quietude of a float trip.

43-1 But along with these positive natural sightings, we also saw the lack of small cottonwood seedlings that would in time replace the old cottonwood patriarchs that were suffering from old age and the whims of a meandering stream bed. We saw the scars left by unknowing and possibly uncaring ORV's. We also saw the effects of overgrazing in a reparian zone. The impact of man on such a unique and delicate environment was very disheartening.

Southern Arizona cannot afford to abuse its limited waterways. I understand the need for multi-purpose public lands, but we should do everything possible to preserve the scarce reparian zones because they are so important for many different types of life. These

Located at 3231 North Craycroft Road
(602) 327-6395

District Manager
August 8, 1983
Page 2

43-1 zones are just too narrow to be compatible for ORV's, cattle, campers, and natural wildlife. With all the area open and available for the ORV's, please leave the Gila Box reserved for the low impact use of wild animals, and use a limited permit system for foot and boat travel. Please include all 17,831 acres into the proposed wilderness area. I feel it is more important to preserve this area as is than to ruin it with ORV's which will surely happen if allowed.

Thank you.

Very truly yours,

J Markle Austin

J. Markle Austin
Director, Wilderness Program

JMA:dl

RESPONSE — LETTER 43

43-1 See Response 1-2.

44

4 August 83
11833 N 64 St
SCOTTSDALE, Az
85254

District Manager, BLM
425 E 4th St
Safford, Az 85546

Gentlemen:

Thank you for coming to Phoenix and holding a hearing on the Safford District BLM Draft Environmental Impact Statement regarding Wilderness Study Areas. I am especially interested in the Gila Box, which I had the opportunity the go through this spring on a raft trip. This riparian paradise should all be made a wilderness since 17,831 acres is not all that large. More and more people are going to wilderness areas to get away from the pressures and crowding in urban areas. In the next twenty years, it is estimated that there will be more people born than were born in the previous million years. The pressure to move and build everywhere will become greater and every acre that can be set aside now will be needed even more in the future. Already there is not enough wilderness. We had to call way in advance to hike in your Aravaipa canyon earlier this year. as usual, we had a group of friends and families that wanted to go togeather, Because of the limitations on wilderness and the demand, we ended up having to split the group into two different days. This situation is the same everywhere there is a wilderness with water.

Rafting in the Gila Box was a unique experience. I have rafted the Colorado from Phantom Ranch to Lake Mead, I am writing this on Lake Powell, I have rafted the Salt from the bridge in Salt River canyon to Roosevelt, the North Fork of the Salmon in Idaho and the Salt below Stewart Mountain dam. Each has its own special attributes. The Gila Box has some wildlife, bluffs and sidestreams found on no other stream. The fact that the mine plans on tailing ponds near the wilderness should not effect the sights along the river. Plantings required on mine operations can be planned that will keep the view unmarred. While the mine is important to the economy of the area, the mine and wilderness can exist with a little

planning. The small inconvenience to the mine compared to the desireability of the Gila Box Wilderness should weigh greatly in favor of wilderness.

In regards to ORV use, there are so many acres of the state where they can get to, it seems to me this should not have much of an impact. Out of the hundreds of miles of the Gila and its tributaries the Gila Box is only a very short segment that could be set aside and preserved for generations to come. There are no reasons that have been put forth that really make sense in light of the desireability to preserve some of the land in its natural state.

Sincerely
RA Johnson

45

Ms. Maureen Mageau-DeCindis
709 W. 12th Street
Tempe, Arizona 85281
August 12, 1983

BLM--Safford District
425 E. 4th Street
Safford, Arizona 85546

To Whom It May Concern:

45-1 I would like to take this opportunity to express my concerns for the Gila Box area. I support this area of 17,831 acres to be designated as Wilderness. I oppose the construction of the Camelsback Dam and Quail Springs and Conner dams. I am also concerned with over grazing in the riparian habitats of the Gila Box and Bonita Creek. I would agree with the suggestion of the Arizona State Game and Fish department to fence in both these areas.

Wilderness and nature are precious to the world and should be preserved.

Thank you for your attention.

Sincerely,

Maureen Mageau-DeCindis

Maureen Mageau-DeCindis

RESPONSE — LETTER 45

45-1 The Safford District recognizes that the broadleaf riparian community along the Gila and San Francisco Rivers has deteriorated. In progress are several major projects to rehabilitate the river vegetation—fencing of 3 miles of the San Francisco River and 22 miles of the Gila River and planting of riparian trees along the river courses.

The Gila-Peloncillo Habitat Management Plan, prepared by BLM in cooperation with the Arizona Game and Fish Department, recommended fencing of the river canyons to manage livestock grazing. In cooperation with the ranchers, the rivers will be fenced to control livestock use of vegetation in the river bottoms. The project began in 1984, upstream of the WSA on the Gila, and is expected to take approximately five years to complete.

46

District Manager
BL M Safford District
Safford, AZ

11.08.83.

Herewith I submit my comments in response to Safford Wilderness DEIS. Some of the WSA-s I have visited in recent years. I do not belong to any organizations so the views expressed are strictly my own. Activities engaged were hiking, camping and 4x4 explorations on established roads and ways. I belong to the unorganized outdoors recreationist.

Since I do not support any one Alternative in whole I shall make my comments as to each WSA separately.

NEEDLE'S EYE 4-1A Support the PROPOSED ACTION. But with the exclusion of the vehicle way that impairs naturalness mentioned on p.16 in your DEIS.
This WSA has the lowest elevation of them all therefore adding variety and attractive yearlong opportunity.

BLACK ROACK 4-8 Support Enhanced Wilderness.
Another lowland unit offering yearlong enjoyment.

FISHHOOKS 4-14 Support the Proposed Action.
The 4930 acres excluded had so many roads, ways and range improvements it could not be classified as quality wilderness.

DAY MINE 4-16 Support Proposed Action.

GILA BOX Support the Moderate Wilderness Proposal.
This is a reasonable compromise by excluding the very irregular and narrow part which would be difficult to close effectively to vehicular entry. This version leaves out the well traveled Gillard Hot Spring Rd. and the narrow Eastern section. This compromise will encourage the re-planting and bring the ORV volunteers into the management process.

TURTLE MTN. Proposed Action unless the inholdings in sec 16 & 32 can be purchased or obtained by exchange, in that case support the Enhanced Wilderness Action.

Javelina Peak Proposed Action.
Difficult to manage and to keep out ORV use.

Peloncillo Mountain. No wilderness. Support the Proposed Action.
Border too irregular, the visitor has to be a surveyor to know if he is inside a WA or outside.

HAPPY CAMP CANYON Proposed Action.
This will exclude the cherry stemmed roads. A wilderness is not enjoyable when there are roads inside occasionally used by inhold owners, even if infrequently.

Sincerely, Harry Melts

Harry Melts
Box 663
Creston, B.C. Canada

47

x/13/83

District Manager, BLM:

I am writting to support Wilderness For all 17,831 acres of the Gila Box. This Beautiful and delicate riparian area possesses ~~seven~~ Scenic and recreational valuos Found in very Few places in the Southwest. ORV use will in the Long run Prove very destructive to this beautiful place. Wilderness designation is the only way that this unique area can be protected. Please consider what is best. For this area, I beleive wilderness is the best Form of Land mangement here. 47-1

Sincerely,

Jim Vaaler

RESPONSE — LETTER 47

47-1 See Response 1-2.

48

911 N. Perry Ave
Tucson, AZ 85705
August 13, 1983

District Manager Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear District Manager;

I have experienced (along with my wife) the Gila Box Wilderness while on a Spring rafting trip. It was a contemplative as well as exhilirating experience.

Having backpacked into wilderness areas, it was actually a pleasure to float into the back country. I hope that the Bureau of Land Management sees fit to designate the Gila Box as a wilderness area, with government sanction to be protected and not encroached upon by industrial mngmnt. or as an area that should be designated for development.

Please keep all 17,831 acres for the Gila Box Wilderness.

Sincerely,

49

U.S. Department of Transportation
Office of the Secretary of Transportation

400 Seventh St., S.W.
Washington, D.C. 20590

August 12, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the proposed Safford District Wilderness Program.

In the absence of any issues significant to transportation, we have no comments.

Sincerely,

Eugene L. Lehr

Eugene L. Lehr, Chief
Environmental Division
Office of Economics

50

Allen T. Cooper
Mining Engineer, Geologist
5712 West Louisiana
Tucson, Arizona 85746
August 9, 1983

District Manager
Bureau of Land Management
425 East Fourth Street
Safford, Arizona 85546

Dear Sir:

50-1 I would like to enter my comments for the record against the proposed recommendation for inclusion of AZ-4-8 Black Rock as a wilderness area. Inclusion of the Black Rock area would lock up an area that could be a potential mineral resource. I am basing my observations on a geological map of the area (Graham and Greenlee Counties, Arizona) prepared by the Arizona Bureau of Mines (University of Arizona - Please see attached map). The first thing that is noticed in the proposed wilderness area is the existence of a Granitic Batholith of Laramide age. The stock appears to be in contact with the Pinal Schist formation to the south of Black Rock and to the east and southeast of Jackson Mountain. I feel that this area has potential for metallic mineral deposits. (i.e. Copper, Molybdenum, Tungsten) at depth as: replacements in the Metamorphic rocks or possibly fault blocks of Paleozoic Sediments, vein related deposits cutting and fracturing all rocks or low grade, disseminated deposits in the main Laramide type stock. The point that cannot be ignored is that most all of the major Porphyry Copper Orebodies in Arizona are Laramide in age with associated intrusive rocks ranging in classification as Granite Porphyries to Granodiorite Porphyries. Please find the attached Table 2.1, which was taken directly out of Advances in Geology of the Porphyry Copper Deposits, Southwestern North America, Spencer R. Titley, Editor, The University of Arizona Press/Tucson, Arizona. Note, in particular, the age (in million years) of the major Prophyry Copper systems. It is well known that the Laramide time occurred between 55-75 million years ago. With the exception of one (1) case (#35 Bisbee), all the Copper systems listed formed during the Laramide. Please note that the Granite Batholith I am referring to is listed as Laramide in age. An example of replacement Ore deposits in the Pinal Schist with associated Laramide Intrusives is the Ray Deposit, which is owned and operated by Kennecott Minerals Corporation.

It has been called to my attention that the following properties around the Jackson Mountain and Black Rock area contain significant mineralization:

1) Approximately midway between Jackson Mountain and Black Rock (Holdip Canyon area) near the ONeal

District Manager
Bureau of Land Management
August 9, 1983
Page 2

50-1

Property, a shaft was sunk which exposed Copper and Silver mineralization.

2) South of the Hinton Ranch (Beauchamp Canyon area), a few shafts and prospects indicated Copper mineralization with Chalcocite (major Ore mineral of Copper) occurring on the surface.

3) The Rhodes Fluorospar Mine - The existence of coarse grained Fluorospar indicates the extent of significant mineralization in the southern half of the Batholith. Fluorite is generally accepted as representing late stage mineralization of a Porphyry Copper system.

4) Other areas not exactly within the WSA, but still associated with the same Laramide Batholith are the Fisher Copper Property (6 miles west of Black Rock), the Cobre Grande Copper Mine and the Grande Reef Copper Mine east of Aravaipa. It is of my opinion that these occurences are not isolated, but part of a larger mineralized system related to the Laramide stock.

50-2

A final point I would like to make is that I do not understand how your office of the Bureau of Land Management can make an evaluation (considering mineral potential) on a proposed wilderness area when there is not a geologist listed on your staff.

Thank you very much for your time and consideration.

Sincerely,

Allen T. Cooper

Allen T. Cooper
Mining Engineer, Geologist

ATC/klm
Attachments

TABLE 2.1
Radiometric Age Dates of Some Porphyry Copper Systems of the North American Southwest

Porphyry Copper System	Age (in m.y.)
Arizona	
1. Mineral Park	71.5
2. Bagdad	70.9
3. Copper Basin	64
4. Copper Cities	63.0
5. Castle Dome	57.8
6. Inspiration	57.8
7. Miami	—
8. Ray	65.4
9. Christmas	62.0
10. Poston Butte	62.0
11. Sacaton	64.5
12. Vekol	—
13. Lake Shore	64.1
14. Silver Bell	67.1
15. San Manuel-Kalamazoo	67
16. Copper Creek	67.5
17. Morenci-Metcalf	55.2
18. San Juan	—
19. Lone Star (Safford)	62.4
20. Sanchez	—
21. Casa Grande	—
25. New Cornelia	63.0
26. Pima	56.7
27. Mission, et al.	56.7
28. Sierrita-Esperanza	61.6
29. Twin Buttes	58.6
30. Peach-Elgin	—
31. Rosemont	—
32. Red Mountain	—
35. Bisbee	163-178
New Mexico	
22. Tyrone	56.2
23. Chino	59.0
24. Hillsboro	73.4
Sonora, Mexico	
33. Cananea	58.5
34. La Caridad	53.0

Sources: Creasey and Kistler (1962), #35; Damon and Mauger (1966), #33; Hedlund (1974), #24; Kelley (1977), #29; Langlois (1978), #26; Livingston (1973), #1-6, 8-11, 13-17, 19, 22, 25, 28, 34.

NOTE: Numbers of systems are keyed to the location map in Figure 2.1.

RESPONSE — LETTER 50

50-1 The information provided on mineralization near the O'Neal property and in the Beauchamp Canyon area was not considered in the analysis of the draft EIS. The other areas of mineralization as well as the geologic map and publication you mention were considered in the analysis of mineral potential for this WSA. The draft EIS (page 112) recognizes the granitic batholith and the associated mineralization that could occur within the WSA. The information provided supports the conclusion that the possibility of mineralization exists within the WSA. While wilderness designation would adversely impact exploration, production potential in this area is still considered low. The BLM proposal emphasizes management of the wilderness resource while excluding that part of the WSA containing known fluorspar mineralization. Further mineral assessment will be made by the U.S. Geological Survey and Bureau of Mines for all areas recommended by the Secretary of Interior for wilderness designation. For further information, see Response 30-2.

The map accompanying this input was not reproduced in this document. It is available for inspection at the Safford District Office.

50-2 In the process of analyzing the mineral potential of the WSAs, BLM contracted with the Arizona Bureau of Geology and Mineral Technology (ABGMT) to conduct a literature search of all available information. The Safford District mining engineer is well qualified to summarize ABGMT's work and make conclusions concerning mineral potential. Many hours were spent in consultation with industry, ABGMT and other professionals in the field on the mineral potential of these areas.

51

Ref. 8500
Aug. 14, 1983

Mr. L. Rosenkrance
District Director
Bureau of Land Management

Dear Mr. Rosenkrance:

I am writing to comment on the proposed wilderness designations for the wilderness study areas in your district. I was impressed by the overall quality of your Draft EIS; there is no observation I could add to those of the report.

However, as you have probably assumed, if I was completely satisfied with the recommendations of the Draft EIS I would not be writing. There are three WSA's in particular that I feel were not recommended for adiquate protection: Happy Camp Canyon WSA, Javelina Peak WSA, and Gila Box WSA. I would like to make the following suggestions.

51-1 1) Happy Camp Canyon: Please consider extending the proposed border a bit eastward. Most of this WSA is quite beautiful. (I have enclosed a few photos I've taken in the past near the eastern boundary of the WSA.) This area has several features worth protecting, including petroglyphs, ①

2) Javelina Peak: As the draft EIS states, this area offers "outstanding opportunities" for primitive recreation. Quoting from the EIS: "scenic, geologic, ecologic and paleontological features enhance the WSA wilderness values." By having the wilderness boundaries avoid roads and ORV use areas near the periphery of the WSA, we can protect this worthwhile area. 51-2

3) Gila Box: The reasons given for removing this entire area from wilderness consideration were, in my opinion, weak. The laudatory description of this area in your report is an indication of it's beauty and potential for primitive recreation. I sincerely hope that you will recommend wilderness status for a portion of this WSA.

In Conclusion, I hope that you can be a bit more generous in your final recommendations. If, sometime in the future, we absolutely need to use a wilderness area for some other purpose, it will still be possible. The opposite is not the case. It would be a shame to lose these wilderness areas forever.

Thank You for Your Time, Dan

RESPONSE — LETTER 51

51-1 The boundary of the area recommended for wilderness in this WSA has been expanded eastward to the Sheep Canyon drainage. State of Arizona Section 16, T. 14 S., R. 28 E. has been acquired and added to the area proposed for wilderness. The BLM has also acquired Section 36, T. 13 S., R. 27 E., and the subsurface of the N½ and SW¼ Section 2, T. 14 S., R. 27 E. (split-estate section dropped from wilderness study August 9, 1983). With the acquisition and addition to the *Proposed Action* the total area recommended for wilderness is now 11,998 acres.

The photographs accompanying this input were not reproduced in this document. They are available for inspection at the Safford District Office.

51-2 The boundaries of this WSA can be adjusted to eliminate the lands of lower wilderness quality and to eliminate most of the ORV use areas. However, BLM does not feel the area possesses such outstanding overall wilderness values that wilderness designation is warranted. The EIS states that the *Proposed Action* would minimally impact wilderness values. Minimal adverse impacts are expected but the district will take whatever action is necessary to manage the wilderness values and other multiple use values in the WSA.

52

Box 34
Wilkeson, Washington 98396
14.08.83

Safford District Office
Bureau of Land Management
425 East Fourth Street
Safford, Arizona 85546

Dear People,

I would like to submit the following comments on the Draft E.I.S. for the Safford District Wilderness EIS Area:

1. The paramount objective in the management of these lands is to protect and improve the productivity of the range and the condition of the watersheds. The various multiple uses should be managed within the constraints imposed to protect such watersheds.

2. Lands that are unsuitable for grazing should be identified and permanently excluded from that use (includes lands easily eroded because of steepness, aridity, or insufficient cover).

3. Sufficient forage should be left after grazing to protect and enrich the soil, reduce evaporation, induce water infiltration, and encourage root system development of native plants.

4. Measures to correct damage from grazing should be taken first where the greatest correctible damage is occurring.

5. Adequate food, cover, and other habitat should be reserved for wildlife, particularly during periods of nesting, breeding, and rearing of young, and for winter survival.

6. Wildlife concerns should be built into all decisions, including those on fence construction, vegetation manipulation, allotment management, and water improvements.

7. Native fisheries should be protected and/or restored by providing for optimum water conditions and habitat.

8. Riparian areas should be given special protection through various measures such as grazing rotation and fencing to maintain and/or restore the quantity and quality of water, the health of streamside shrubbery and forage productivity, to prevent streambank erosion and to protect habitat for fisheries, waterfowl, and other wildlife. This includes protection of springs.

Any riparian area in the E.I.S. area now classified as being in "fair" or "poor" condition should be relieved of severe grazing impacts as soon as possible. These riparian areas must be rehabilitated until woody vegetation and trees recover and a more natural state is achieved. Following this initial recovery, the impacts of future grazing activities should be monitored and action taken to avoid similar, severe impacts in the future. Exclusion of livestock will probably be necessary in many places.

-2-

9. Willful or negligent trespass cannot be tolerated.

10. Grazing should be practiced in moderation to assure sustained forage productivity. Drought cycles must be taken into account in determining the amount of grazing use.

11. Ranges in "fair" to "poor" condition should be managed to improve their condition expeditiously. A "no change" or "static" trend is unacceptable in ranges that are in "fair" or "poor" condition.

12. Range improvement systems or methods should be as simple as possible, easy to operate, and inexpensive to maintain. The range should not be managed and developed to a level of production sustainable only by artificial and periodic treatments.

13. Improvements such as fencing and water development should either benefit other uses or offer minimal interference to such uses.

14. For necessary reseeding, native species should be favored.

15. Fire is an acceptable management tool, provided wildlife and watershed protection are given adequate consideration.

16. Until herbicides and pesticides are developed that control only targeted species and carry minimal health and safety risks, they should not be used.

Sincerely yours,

Karl Lundberg

53

DAN S LEETH
wilderness
backpacking photography

P.O. Box 440289
Aurora, Colorado 80044
August 15, 1983

District Manager
Bureau of Land Managment
425 East Fourth Street
Safford, Arizona 85546

Dear Manager:

[Please make the following comments in favor of the proposed wilderness designation for the Gila Box part of the official D.E.I.S. record.]

As a long time Arizona resident (recently transplanted to Colorado), I am writing in support of wilderness designation for one of my favorite areas, the Gila Box. My reasons for supporting wilderness designation are many--

Solitude: I know of few other areas where one can really get away so well. One seldom sees another human while floating down the river in this area.

Wildness: I have floated a number of wild rivers including rivers in California and Colorado. Few compare with the Gila in terms of providing a feeling of remoteness.

Wildlife: It is truly amazing just how many varieties of wildlife can be found in this area, and numerous photographs I have teken prove it.

In short, the area qualifies as wilderness, and urge the Bureau of Land Management to recommend to Congress that **all 17,831 acres be preserved as wilderness.**

Sincerely,

Dan Leeth

54*

August 4, 1983

Mr. Lester Rosenkrance
District Manager
Safford District
Bureau Land Management
Safford, Arizona 85546

Dear Mr. Rosenkrance,

I would like to take this opportunity to express my approval of your decision to delete ost of the proposed wilderness areas in your crict.

I use the public land for hunting and other types of recreation. I would not have adequate access if large tracts were made into wilderness.

Sincerely,

Ray Tucker
Payson Star Route
Globe, Arizona
85501

*Identical letters were sent by 44 separate individuals.

55

Mrs. George E. Oler
2510 N. Jonathan - Tucson 85745

August 16, 1983

To- District Manager BLM
425 E. 4th st.
Safford, Az 85546

I am urging you to keep the Gila Box as a wilderness area. It is a beautiful spot and deserves the protection of "Wilderness". There is plenty of room for ORV people in other areas. They don't need to drive into this beauty spot.

Thank you.

Sincerely,
Mrs. George E. Oler

56

16 August 83 Tuesday

Dear Mr. Rosenkrance...

I have been informed that there is some strong opposition to the wilderness in the Gila Box. I find that very disturbing to me and I want to add my statement in favor of the wilderness. It's my understanding that the opposition is from offroaders.

I own a four wheel drive truck and love 4-wheeling. However, the Gila Box is not the area for that sport.

There are 17,831 acres that you could save for me and others who believe as I do. I always hear how backpackers are in the minority, but being in the minority doesn't mean anything to me. I don't want my wilderness stolen from me.

56-1 The Gila Box is very important for Black Hawk and Peregrin Falcon. When I hike, I want to hear the cries of these birds, not the rumbling and whining of offroad vehicles. Bring in large volumes of people with vehicles and these birds will leave.

There are already prime ORV areas that I visit and see many other ORVers enjoying. Please save the Gila Box for the people who are serious about their privacy and one on one experiences with nature.

Thank you for your time,
Lois Johnson
4337 E. Catalina Circle
Mesa, Az 85206

RESPONSE — LETTER 56

56-1 See Response 1-2.

57

Rt. 5, Box 5233
Boerne, TX 78006
August 15, 1983

District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

I have reviewed the draft EIS for the Safford District. I fully concur with the reasons given for proposing the exclusion of Day Mine, Turtle Mountain, Javelina Peak and Peloncillo Mountains from the Proposed Action. I, however, disagree with the exclusion of Gila Box because of conflicts with ORV use. Gila Box appears to be better suited for wilderness use than for ORV use. Therefore, I favor the MODERATE WILDERNESS Alternative.

Very truly yours,

Charles Urban

Charles Urban

58

MEC

MINERALS
EXPLORATION
COALITION

Minerals Advocate
In Public Policy

12640 West Cedar Drive
P.O. Box 15638
Denver, Colorado 80215
303/989-5567

August 16, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

These comments constitute the response of the Minerals Exploration Coalition (MEC) to the Safford District Draft Wilderness Environmental Impact Statement. The MEC is a coalition of exploration companies and individuals conducting exploration on federal lands.

58-1 In view of the fact that wilderness areas designated after December 31, 1983, will be withdrawn from appropriation under the mining and leasing laws, we believe that all areas with mineral and energy potential should be excluded from wilderness designation, even though no economic deposit is now known. The withdrawal limitations will preclude the collection of new data, and new areas of mineral potential will not be found. With new disciveries effectively stopped, the policy of excluding all currently known mineral potential from wilderness should be followed, so that exploration of these areas will not be restricted and minerals might yet be produced. Explorationists tend to look at the long term because the lead time of discovery may be ten to fifteen years. The impact of wilderness on minerals should be assessed over the long term (a century or more). We believe that land use decisions should be in conformity with the policy statements made in the National Minerals Program Plan and Report to Congress released by the President in April, 1982.

58-2 The MEC generally endorses the proposed action alternative with some reservations. The Needles Eye WSA is an area with

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**Executive Committee member*

Page 2
BLM/Safford District
8/16/83

58-2 good exploration potential, yet it is recommended for wilderness designation - all 43 claims remain in the WSA. The entire WSA should be removed from further consideration for wilderness designation or boundary changes should be made to exclude areas of mineral potential. In the Fishhooks WSA, the oil and gas leases and other areas of mineral potential should be excluded from the WSA.

Thank you for the opportunity to comment on this draft environmental impact statement.

Sincerely,

John D Wells
John D. Wells
President
MINERALS EXPLORATION COALITION

JDW/th

RESPONSE — LETTER 58

58-1 In the process of analyzing the mineral potential of each WSA, BLM contracted with the Arizona Bureau of Geology and Mineral Technology (ABGMT) to conduct a literature search of all available minerals and energy information. The district mining engineer analyzed that data, and drew conclusions concerning the mineral potential in each WSA. Many hours were spent in consultation with industry, ABGMT and other professionals in the field concerning the mineral potential of the WSAs. Further mineral assessment will be made by U.S. Geological Survey and Bureau of Mines concerning the mineral potential of the areas. Long term (a century or more) impact would be excellent information if it were available. However, this type of assessment is not possible. There are too many unknown variables such as economics and technology. Based upon current information, the district believes its recommendations are rational and logical and also that the process employed to determine wilderness suitability is consistent with the National Minerals Program Plan and Report to Congress. Also see Response 30-2.

58-2 The mining claims within the Needle's Eye WSA are part of a much larger block lying outside the WSA. The *Proposed Action* would protect the values of the wilderness resource without significant impact to the larger portion of the area of mineral interest. The district selected the *Proposed Action* in the Fishhooks WSA because it protected the highest quality wilderness values while removing all the area of current mineral interest. Both recommendations were compromises that provided for the multiple use management of these two areas of public land.

59

BRUCE BABBITT, *Governor*

Commissioners:
FRANK FERGUSON, JR. Yuma, Chairman
FRANCES W. WERNER, Tucson
CURTIS A. JENNINGS, Scottsdale
JOHN J. GISI, Flagstaff
FRED S. BAKER, Elgin

Director
BUD BRISTOW

Deputy Director
ROGER J. GRUENEWALD

ARIZONA GAME & FISH DEPARTMENT
2222 West Greenway Road Phoenix, Arizona 85023 942-3000

August 18, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
Safford District Office
425 East 4th Street
Safford, Arizona 85546

Re: Safford District
Draft Wilderness
Environmental Impact
Statement

Dear Mr. Rosenkrance:

The Department has reviewed the referenced Draft Wilderness Environmental Impact Statement (EIS) and wishes to provide the following comments.

We believe the draft EIS accurately and adequately describes the environmental scenes of the nine (9) Wilderness Study Areas (WSA's) and the environmental consequences of proposed wilderness designation in those areas. We do offer, however, two suggestions for inclusion within the EIS.

59-1 The discussion under the heading "Management", on page 18, should be expanded to include a provision for prescription fire management. It has been our experience that controlled burns may be necessary to maintain ecosystem integrity/diversity if, for some reason, wildfire is not a natural occurrence. Additionally, we suggest that wildlife water developments be specifically mentioned under new projects, as legitimate activities in wilderness, as long as the environmental analysis process is followed.

Mr. Lester K. Rosenkrance - 2 - August 18, 1983

In the overall review and evaluation of the nine (9) WSA's, the Department supports the Bureau's Proposed Action (Preferred Alternative), including the following four (4) areas:

Needle's Eye	(AZ-4-1A)	8,970 acres
Black Rock	(AZ-4-8)	6,590 acres
Fishhooks	(AZ-4-14)	10,083 acres
Happy Camp Canyon	(AZ-4-65)	9,238 acres

In addition to the above four (4) areas, the Department supports the wilderness designation of the Gila Box WSA (AZ-4-22/23/24 (A)).

The Gila River system above San Carlos Lake is the last significant free-flowing, undeveloped river in Arizona and is therefore a unique remnant of what was once a larger biological unit. These riverine, riparian, cliffside, and transition habitats are worthy of a high degree of management and protection.

The Department has discussed this issue before with the Bureau in order to find an administrative method of protecting the Gila Box. Until such time as a mechanism (regulation) is identified and operable, we must continue to recommend and support wilderness status for this unique area, as the best means to insure long-term protection.

The Department appreciates the opportunity to review and to offer comments on this draft EIS.

Sincerely,

Bud Bristow, Director

Robert K. Weaver
Habitat Evaluation Coordinator
Planning and Evaluation Branch

RKW:dd

cc: State Clearinghouse, AZ 83-80-0023

RESPONSE — LETTER 59

59-1 See text, Chapter 1.

60

Wildlife Management Institute
Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

August 16, 1983

District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Sir:

The Wildlife Management Institute is pleased to comment on SAFFORD DISTRICT DRAFT WILDERNESS ENVIRONMENTAL IMPACT STATEMENT, Arizona.

From a wildlife management standpoint, we believe the preferred alternative on Needles Eye, Black Rock, Fishhook, Turtle Mountain, Javelina Peak, Peloncillo Mountain and Happy Camp Canyon will be satisfactory.

60-1 We believe DAY MINE should be classified for the enhanced wilderness alternative, as it is only one of three transitional vegetation wilderness study areas in a large area.

60-2 We believe GILA BOX area should be all wilderness. This is the last section of free flowing river in Arizona and should be restored to its original habitat conditions.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:lbb

DEDICATED TO WILDLIFE SINCE 1911

RESPONSE — LETTER 60

60-1 The BLM does not feel the wilderness values of the Day Mine WSA are so outstanding that they require wilderness designation. For further information on the rationale, see Response 31-1.

60-2 See Response 45-1.

61

United States Department of the Interior
BUREAU OF MINES
P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225
Intermountain Field Operations Center

August 17, 1983

Your reference:
8500

Memorandum

To: District Manager, Safford District, Bureau of Land Management,
425 E. 4th Street, Safford, Arizona 85546

From: Chief, Intermountain Field Operations Center

Subject: Draft environmental impact statement (EIS) for wilderness designation of wilderness study areas in the Safford District, Cochise, Gila, Graham, and Greenlee Counties, Arizona, and Hidalgo County, New Mexico

The U.S. Bureau of Land Management has identified nine Wilderness Study Areas (WSAs) ranging in size from about 8,500 to 17,900 acres, and totaling 131,820 acres, in the Safford District, Arizona. The EIS assesses the environmental consequences of managing these areas as wilderness. Five alternatives for each WSA are considered, including the "all wilderness" and "no wilderness" options. The proposed action recommends that 45,073 acres in four WSAs be managed for wilderness values, and that all of the remaining lands be considered "no wilderness."

61-1 The Bureau of Mines is concerned with impacts on mineral resources and development. As wilderness designation removes lands from future mineral exploration and development, it is important to identify mineral resources in candidate wilderness areas as early as possible.

The EIS contains a thorough assessment of mineral occurrences and impacts both in and near the subject areas based on current knowledge. Mitigation of most conflicting minerals impacts is achieved in the proposed action by recommending "no wilderness" status for the areas involved.

We concur with these recommendations.

The EIS does not establish that the 45,073 acres recommended for wilderness management lack mineral values. Studies to determine the type and amount of mineral resources on these lands must be made by the U.S. Geological Survey and the U.S. Bureau of Mines as required by the Federal Land Policy and Management Act (Public Law 94-579, October 21, 1976). The four WSAs remaining in the proposed action are scheduled for field examination in FY 84. Reports based on these studies will provide information essential for determining the suitability of land for inclusion in the National Wilderness Preservation System to the President, Congress, the Department of the Interior, and the general public.

Consequently, we have no further recommendations at this time.

Donald P Blasko
Donald P. Blasko

RESPONSE — LETTER 61

61-1 As you state on the second page of your comment, further studies will be conducted by your agency and the U.S. Geological Survey to determine the type and amount of mineral resources present in the WSAs recommended preliminarily suitable for wilderness status. The information gathered by these essential surveys will provide the Secretary of the Interior with information he must have prior to forwarding his recommendation to the President.

62

8-19-83

Dear Sir,

As I am a hiker and a lover of wilderness, I support wilderness designation for the 17,000+ acre of the Gila Box.

There is all to little for the hiker that likes to get away from it all.

I used to own a 4-wd. drive but I gave it up, as most of ORV owners despoil the wilderness.

Sincerely

Fred Liddle

FRED LIDDLE
615 W ALTURAS #16
TUCSON AZ 85705

63

P.O.Box 5463
Phoenix, Az. 85010
August 19, 1983

Lester Rosenkrance, District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Az. 85546

Dear Mr. Rosenkrance:

Please enter this letter as part of your official hearing record on your draft environmental impact statement of your wilderness study areas.

I support the 17,831 acre Gila Box Wilderness!

This area is highly significant for its variety of animal species, such as the black hawk and the peregrin falcon. This is a great area for backpacking and river rafting. It is an area where one can enjoy the natural environment. A place where one can appreciate solitude.

Arizona is growing rapidly. We need to preserve this unique area as a heritage for future Arizonans.

Sincerely,

Karen [illegible]

64

August 22, 1983

District Manager
Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Sir:

This letter concerns the proposed Wilderness status for the 17,831 acres of the Gila Box area. In the spring of 1982 my husband and I rafted down the Gila from the confluence with the San Francisco to Safford. Because we had not been able to set aside enough time or money for a big river trip like the Grand Canyon, this was a great adventure for us. We were not dissappointed. The Box is so special considering that the area through which the river flows is desert; we were continually amazed at the lush vegetation, including many species of plants we'd never seen before. It was remarkably untouched and beautiful.

We also saw several species of songbirds in surprising numbers; unfortunally, we didn't see a Black Hawk which I'm told can be found in the area.

64-1 In my opinion, allowing ORVs into an untrampled area like this would be a bad mistake. There are few enough areas left in our state for people who want to experience a true state of wilderness; ORV enthusiasts have many places to go and are generally not interested in preserving the landscape. Why spoil a beautiful area such as this? I hope you will consider the issue from all sides.

Sincerely,

Liz Wise
Box 827
Whiteriver, AZ 85941

RESPONSE — LETTER 64

64-1 See Response 1-2.

65

August 20, 1983

This letter is in support of the 17,831 acre Gila Box Wilderness. 65-1 This area needs to be preserved for its beauty s wildlife. There are Too few undisturbed rivers left in Arizona - don't destroy another.

Sincerely,
Deborah Welsch

RESPONSE — LETTER 65

65-1 See Response 1-2.

66

Rt. I, Box 170
Mc Neal, AZ 85617
August 18,1983

District Manager BLM
425 E. 4 th St,
Safford, AZ 85446

Dear Sir:

I strongly support wilderness for the Gila Box Area - AZ-4-22/23/24/(AO). I feel this is an area worth saving as it gives one the experience of starting in the Chihuahan Desert and passig down to the Sonoran Desert, slowly seeing the different vegetation of these two deserts appear. To awaken at dawn and see the cliffs slowly take on pale colors; to be near Eagle Creek and see a pair of Golden Eagles: or happen upon the sight of the fast vanishing Black Hawks; or see the foot mark in the mud of a racoon; or come upon the gnawing marks of a beaver, these make for a feeling of being in a very precious place. There are hardly any other free-flowing rivers with such natural and realatively undisturbed qualities that remain in the Arizona Desert. It should be saved!

The Fish & Wildlife Service feel that Eagle Creek & associated areas of the Gila River were the number two most important areas in Arizona for wildlife habitat and came out about number 50 when compared with all areas of the United States. Save it!

I would like to have my grandchildren have the opportunity to raft down the Gila Box Area and enjoy some of the same wild beauty their grandmother enjoyed in her time. I plan to start my grandsons next spring.

I support 17,831 acres for the Gila Box Wilderness.

Sincerely,
Marie Anita Burling
Marie Anita Burling

just broke my right arm
so excuse typing.

Box 170, Rt.I
McNeal,AZ 85617
August 15,1983

District Manager BLM
425 E. 4th St.
Safford, AZ 85446

Dear Sir:

66-1 I support wilderness for the 12,317 acres of the Peloncillo Mountains - AZ -4-60. What I feel is so great about this area is the diversity of vegetation and topography with enticing scenery. Pine Canyon, above the dam has one of the most beautiful stands of Chihuahuan Pine I have wandered through. Further up we found bear droppings which is exciting as it makes the experience really wild. If one doesn't find some evidence of wildlife then the experience doesn't seem like you have been waking in the wilderness.

The Mexican Pine and Juniper-Oak areas are lovely places to sit under the shade and feel a tiny breeze and meditate. Of course the birds are a delight. I have never noticed or seen the Thick-billed Kingbird, or the Buff-collared Nightjar nesting anywhere else. Also wathed a pair of Zone-tailed hawks in theri mating flights and a Violet- crowned Hummingbird chase a Lucifer. I feel it is a particularly good birding area and should be protected from disturbances that would prevent the birds from nesting in these areas. The canyons contain lush extensions of madrea and riparian vegetation with gorgeous Cottonwood, Walnut, Ash and sycamore relationship. Since we have ruined most of our riparian areas, I feel we should make a special effort to protect what we have left. In fact, Governor Babbitt is studying the situation right now and is coming up with a proclamation on this.

I feel the Baker Canyon, Guadalupe Canyon & Bunk Robinson area which are contiguous should be wilderness.

Sincerely,
Marie Anita Burling
Marie Anita Burling

Just broke my right arm
Excuse typing

RESPONSE — LETTER 66

66-1 It appears you are describing that portion of the Peloncillo Mountains east of Douglas that straddles the Arizona-New Mexico stateline. This area includes the joint Forest Service/BLM wilderness study area of Baker Canyon WSA, Guadalupe Canyon WSA, and Bunk Robinson Peak WSA. Peloncillo Mountain WSA (AZ-4-60) is in the Peloncillo Mountains north of Interstate 10.

67

WWW
Arizonans for quality environment
p.o. box 41294 tucson, arizona 85717
Formerly ARIZONANS FOR WATER WITHOUT WASTE

L. K. Rosenkrance, District
Manager, B. L. M.
425 E. 4th Street
Safford, Arizona 85546

21 August 1983

Dear Mr. Rosenkrance:

We are disappointed that the BLM has, after such a well-conceived beginning, abandoned its commitment to wilderness protection. We do encourage you to maintain the wilderness designations of those few areas listed in the draft EIS. They are certainly deserving of that status. This letter is written primarily to speak in favor of wilderness classification for the Gila Box.

By your own EIS, pp 29 & 30, the Gila Box has outstanding wilderness qualities. The few exceptions you list affect only a very small fraction of the area. Your statement about the value of the perennial streams cannot be overstressed. This is truly a prime area with great value to wildlife.

The basic objections to wilderness designation seem to be management problems. The geothermal potential is not likely to become economically developable for many decades because of its remoteness. The mineral potential is low and the need for the minerals is not likely to be critical for a half century or so. Thus, it seems that the only problem is that you do not trust ORV users to obey the law.

67-1 All of Arizona is, de facto, ORV territory. There are very few exclusions and those are mostly in the National Forests. Wilderness designation will thus not greatly reduce the area available to this form of 'recreation'. How about doing an inventory of 4WD roads and designating some of them as areas for such use? We are sure there are plenty of such roads near every population center to satisfy the demand. Just because ORV's exist does not mean it is right to grant their unrestricted use. They can do more destruction in a day than 100 hikers in a year. They do not need to be able to erode every pretty spot in the State.

We are aware that passing unenforcible laws encourages disrespect for law. On the other hand, there will always be those who will break any law. We do not believe that it is appropriate to assume that the majority of 4 wheelers are scofflaws. We therefore urge inclusion of all 17,831 acres in the wilderness system.

Sincerely yours,

Roy M. Emrick

Roy M. Emrick
Chairman

RESPONSE — LETTER 67

67-1 See Response 1-2.

68

August 21, 1983

Bureau of Land Management
Safford District
Steve Knox - EIS Team Leader
425 East 4th Street
Safford, Az. 85546

Dear Sir:

In addition to the comments I offered at the Safford District Draft Wilderness EIS Public Hearing in Tucson on July 20, 1983; I would like to submit this additional proposal attached. It goes into detail on the Happy Camp Canyon additions that I roughly outlined at the hearings.I would appreciate your consideration of the additions I've outlined. I believe they would provide a more completeand manageable unit. I am pleased that you are proposing the Happy Camp Canyon Unit. Thank you.

Sincerely,

Jim Notestine

Jim Notestine
P.O. Box 461
Sonoita, Az. 85637

HAPPY CAMP CANYON
WSA AZ - 4 - 65

Location: 7 miles South of Bowie, Az.

Size: WSA = 16,761 acres

Proposed Action = 9238 acres

BLM Enhanced Alternative = 12,807 acres

My Enhanced Proposal = 12,000 acres approximately*
*includes approximately 580 acres of State land

Jim Notestine
P.O.Box 461
Sonoita, Az. 85637
(602) 455-5324

August 21, 1983

Happy Camp Canyon - WSA AZ 4-65

I support the decision to propose a portion of the Happy Camp Canyon Unit as a Wilderness Area. I would propose a unit of approximately 2760 more acres than the BLM proposal (my proposed boundaries and additions are reflected in the attached map) which would result in a Wilderness Unit of approximately 12,000 acres. This enhancement is approximately 800 acres less than the BLM Enhanced Wilderness Alternative, but would be more manageable and would more completely protect included ecosystems.

68-1 The recommendedaddition in the area idetified by "A" on the attached map would protect both Ninemile Creek and the stands of large juniper below Government Peak. Under the BLM Proposed Action only that portion of the spectacular granite area around Peak 5019 and only one of the two streams with the "hanging valleys" would be protected. The addition of Ninemile Creek would complete the protection of that exceptional area. This addition would require acquisition of a state land parcel of approximately 580 acres. These two streams and the rugged granite area that surrounds them would provide very scenic primitive recreation with exceptional opportunities for solitude. This addition would keep that area from being fragmented.

68-2 The small addition identified as "B" on the attached map would provide better protection for the Howell Canyon ecosystem.

I support your inclusion of Howell, Upper Happy Camp, and Tar Box Canyons. They are scenic and provide excellent hiking and scrambling opportunities. They also support a diverse wildlife population including Threatened and Endangered Species.

This proposal would include two proposed RNA's and two proposed ACEC's which highlights the exceptional qualities of this Unit. Wilderness designation would be compatible with the RNA's and ACEC's.

CONFLICTS:

The Happy Camp Unit is in the Dos Cabezas Mountains which has an extensive mining history, some of which intrude into the WSA. This 12,000 acre proposal excludes the significant mining conflicts that exist in the WSA.
There are no mining conflicts in the unit and ORV conflicts are minimal.

SUMMARY:

Happy Camp Canyon would make a high quality Wilderness Unit with exceptional primitive recreation potential. Wilderness designation would protect a diverse flora and fauna including several Threatened and Endangered species, beautiful mountain scenery including a rugged exfoliating granite area with streams that have water most of the year. I recommend expansion of the BLM Proposed Action to the 12,000 acre area reflected on the attached map. It would include Ninemile Creek and protect most of the granite dominated area, the heavily vegetated area below Government Peak, and the Howell Canyon ecosystem.

RESPONSE — LETTER 68

68-1 The district is recommending expansion of the *Proposed Action* for Dos Cabezas Mountains WSA to include most of your proposal (see Map 29). The new proposed boundary follows the ridgeline southeast from Government Peak to the Sheep Canyon drainage. This boundary does not include the upper end of Wood Canyon, as you proposed. The ridgeline boundary would preserve wilderness values better than section line boundaries. They are more readily identified. This expansion includes Section 16, T. 14 S., R. 28 E., acquired from the state. BLM has also acquired Section 36 T. 13 S., R. 27 E., and the subsurface of the N½, SW¼, Section 2, T. 14 S., R. 27 E. (split estate section dropped from wilderness study August 9, 1983). With their acquisition and inclusion in the *Proposed Action*, the total area recommended for wilderness is now 11,998 acres.

The map accompanying this input was not reproduced in this document. It is available for inspection at the Safford District Office.

68-2 Area "B" is part of the area recommended for wilderness in the EIS.

69

207 W. Dahil
Tucson Arizona 85705
August 19, 1983

Lester Rosenkrance, Safford District Manager
B L M
425 E. 4th Street
Safford, Az. 85546

Mr. Rosenkrance:

I want to go on record as supporting the Gila Box area for wilderness status. The total acreage of the area should total 17,831 acres.

69-1 There is no way to control the number of or the activities of ORV-operators in the area. The ORV people have many other areas in which to operate their vehicles. Therefore, they are not being deprived of their activities if the Gila Box Area (17,831 acres) is made wilderness.

Also, to revegetate this riparian area will not be possible or practical if the area is not made wilderness. Small trees will not stand up against ORV's.

Therefore, I request that the 17,831 acre area of the Gila Box be designated as wilderness.

Sincerely,

Lee Oler

RESPONSE — LETTER 69

69-1 See Response 1-2.

70

AUG. 20, 1983

DISTRICT MGR, B.L.M.

DEAR SIR:

PLEASE ADD MY NAME TO THE LIST OF THOSE IN FAVOR OF A 17, 831 ACRE WILDERNESS IN THE GILA BOX AREA. THE RIVER, IT'S WILDLIFE AND THE INDIAN RUINS ARE A NATIONAL TREASURE!

VERY TRULY YOURS,

Stephen Bell
1425 N. RIDGEWAY DR.
TUCSON 85712

71

No. 7 Markeen Road
Morenci, Arizona 85540
August 22, 1983

Mr. Lester Rosenkrance
District Manager
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

I have studied the Safford District Draft Wilderness Environmental Impact Statement for the Wilderness Study Areas located within the jurisdiction of the Safford District which was published in June, 1983.

As an outdoorsman, Scoutmaster, and twelve-year resident of Greenlee County, I fully agree with the BLM proposal to leave the Gila Box and Turtle Mountain WSA units in their current multiple use classification and not recommend them to be classified as wilderness.

These areas can and have been properly managed by the BLM to maintain their usefulness for ranchers, local residents, and even those desiring a wilderness-type experience of cross-country travel or river rafting during high water periods on the San Francisco and Gila Rivers without any further restriction on use. History has shown that this management can and will be effective while allowing a diversity of use by a majority of users, rather than single use by a very small select minority.

I support the BLM proposed action as detailed in the June, 1983 DEIS and applaud BLM for their thoroughness of fact finding upon which their decisions were based.

Sincerely,

EMSchern

E. M. Schern

EMS:jc

72

8/22/83

LES ROSENKRANCE
DISTRICT MGR.
BLM
SAFFORD, AZ 85546

DEAR LES,

I AM WRITING TO ADD MY SUPPORT FOR THE WILDERNESS PROPOSAL FOR THE 17,831 ACRES IN YOUR DISTRICT KNOWN AS THE GILA BOX. I FULLY SUPPORT INCLUSION OF ALL OF THE 17,831 ACRE[illegible] AREA AS WILDERNESS FOR THE FOLLOWING REASONS:

1) RICHNESS & VARIETY OF HABITAT FOR WILDLIFE, ESPECIALLY BIRDLIFE. IN MY FLOAT TRIP THROUGH THE BOX I COUNTED 35 SPECIES OF BIRDS & DUCKS. THIS IS A RICH RIPARIAN HABITAT.

2) PRESERVATION OF A FREE FLOWING STRETCH OF THE GILA RIVER.

3) PRESERVATION OF SOME UNIQUE GEOLOGICAL FORMATIONS SUCH AS THE ORANGE CLIFFS.

72-1 4) ANY ORV USE OF THIS AREA CANNOT HELP BUT DEGRADE THIS DELICATE ECOSYSTEM. INCLUSION AS WILDERNESS STRICTLY LIMITS SUCH ACCESS TO THIS UNIQUE AREA.

THANK YOU FOR YOUR TIME AND CONSIDERATION.

FEEL FREE TO CONTACT ME IF THERE ARE SPECIFIC QUESTIONS ON MY REASONS FOR SUPPORT.

W. KEIRN ROACH
W. Keirn Roach
8/22/83.

7722 E. ELIDA ST.
TUCSON, AZ. 85715

RESPONSE — LETTER 72

72-1 See Response 1-2.

73

August 14, 1983

Lee Rosenkrance
Safford District Manager
Bureau of Land Management
425 E. 4th St.
Safford, Arizona 85546

Dear Mr. Rosenkrance:

As a citizen of Arizona I am writing to express my support for designation of the 17,831 acres of the Gila Box Region as a full wilderness region.

This is an area which offers beautiful expanses of the natural environment of Arizona. In
73-1 particular, the negative impact of off-road vehicles on the environment must be curtailed— for example, erosion of the river bed and noise disturbance of nesting birds. Further, damming
73-2 would destroy this unique and fragile place.

Thank you.

Anne M. Murray, Ph.D.
2733 E. Malvern

RESPONSE — LETTER 73

73-1 See Response 1-2.

73-2 See Assumption No. 7 in Chapter 4 of the EIS.

74

In June of this year, my husband and I were privilged to make a float trip down the Gila River through the Gila Box canyon. It was a memorable experience, and I am distressed to hear this area may be designated a non wilderness area -

So that others may experience this beautiful riparian environment, please count me as one who favors wilderness designation for all 17,831 acres of the Gila Box - Such areas are rare and fast diminishing, and this is an unusually beautiful and serene place. Please don't turn it over to ORVs - There are lots of other areas they can use!

Sincerely -
Doris J. Beilmann
4732 N. 54th Ave
Phoenix, Az 85031

75

I URGE YOU TO RECOMMEND WILDERNESS FOR ALL 17,831 ACRES OF THE GILA BOX. THE ONLY WAY THAT BEAUTIFUL AREAS LIKE THIS CAN BE PRESERVED FOR ALL TO ENJOY BOTH NOW & IN THE FUTURE IS BY PLACING IT INTO THE FEDERAL WILDERNESS SYSTEM,

SIDNEY HIRSH
4322 E. 7TH ST.
TUCSON, AZ 85711

76

August 21, 1983
77101 California Dr. # A1
Palm Desert, Ca. 92260

Dear Mr. Rosenkrance:

I am writing to request that all efforts be made to support the Gila Box Wilderness. As a prior long time resident of Arizona, I have had opportunities to travel, hike, and raft rivers extensively. I have found the Gila Box to be an area of magnificence and one which should receive prime consideration for preservation as a Wilderness... all 17,831 acres.

Sadly, we humans sometimes do not realize what we have lost until it becomes too late. As I sit in the area of Riverside County, I am choked by smog even although Los Angeles is 3 hours away. I think nostalgically of the beauty that Arizona offers - and pray that Arizona avoids some of the human mistakes that California has made.

Please use every means possible to preserve this precious, scenic area.

Yours Sincerely,
Sally Hitchen, RN, MSN

77

Aug. 19, 1983
1601 W. Dawn
Tucson, 85704

District Manager, BLM
425 E. 4th St.
Safford, Ariz., 85546

Sir:

This letter is in support of proposals to reserve 17,831 acres of an area known as the Gila Box as wilderness. As a native Southwesterner, a seven-year resident of Arizona, and a recent visitor to the Box area, I feel I can speak with some authority on the subject.

The Gila River is certainly an anomaly in Southeastern Arizona, where many of the rivers than once ran year-round now only carry water during infrequent, heavy rains. For this reason alone, the area of the Gila Box should qualify for wilderness designation, to protect it from development and overgrazing that proved fatal to rivers such as the Rillito in Tucson. But in the case of the Gila, there are more reasons, reasons that I was able to see first-hand on a late spring float trip that covered, by raft and on foot, much of the area along and adjacent to the Gila Box from Clifton to Safford.

There are three additional factors that I feel mandate the protection of the Gila Box. First, only a tiny percentage of Arizona is fortunate enough to contain a living river. That the Gila runs in the basically desert area of Eastern Arizona makes it even more important.

77-1 Second, the area contains many varieties of wildlife that I fear would suffer should the area be opened to development and off-road use. On my visit to the Gila, I was fortunate enough to see many raptores, as well as lesser species of birds --the area seems especially popular with cliff swallows - and despite more than 30 years of camping and hiking in Arizona and New Mexico, I had never seen a rattlesnake in the wild until I visited the Gila Box.

77-1 Third, the area contains archaeological sites that certainly would be ravaged should the area be opened to off-road and other uses. One apparently major site lies above the Gila and its confluence with a major tributary. Opening the area to general use would leave nothing to study and nothing for others such as myself to enjoy.

Finally, while not a professional river-runner, I have some experience on Western rivers, and the Gila compares favorably in many ways with some of the more isolated areas. The sense of wilderness is equal to some parts of the Rio Grande Box in New Mexico and to Idaho's Salmon River, and is superior

to that found along the Klamath River in Northern California. Additionally, the Gila provides a unique opportunity to learn and appreciate rafting in Southern and Eastern Arizona. The above reasons, as well as the sense of freedom and isolation, including the opportunity to observe a riparian environment, complete with a fern grotto that is a virtual duplicate of one along the Klamath, makes the Gila Box a matchless area of Southern Arizona.

I urge you to consider as many acres as possible, and preferably the entire 17,831 acres, for wilderness designation. Thank you for your consideration.

Sincerely,

George E. Campbell

RESPONSE — LETTER 77

77-1 See Response 20-1.

78

Jeanne Williams
WESTERN WRITERS OF AMERICA
BOX 105
PORTAL, ARIZONA 85632
(602) 558-2436

August 23, 1983

District Manager
BLM

Dear Sir:

I write to express my feeling that all 17,831 acres of the Gila Box be designated as Wilderness.

Much wilderness is inaccessible. Gila Box offers wonderful opportunities for float trips, hiking and camping in a riparian area--which again, much wilderness is not. ORVs degrade such an area till the enjoyment of others is destroyed. I think ORVs should be restricted to places they've already wrecked.

78-1 A number of rare birds nest in this region, black hawk, bald eagles, zone-tailed hawks. They won't be much affected by floaters and hikers but the heavy impact of big camping vehicles and ORVS would certainly disturb their nesting--and they have few refuges left in Arizona.

The recreational value of Gila Box is much greater as wilderness than as a place open to vehicles.

Sincerely,

Jeanne Williams

RESPONSE — LETTER 78

78-1 See Response 1-2.

79

S. Lee Spencer, Ph.D.
1115 E. Marlette
Phoenix, AZ 85014

August 23, 1983

District, Manager, BLM
425 E. 4th St.
Safford, AZ 85546

I took a 2-day river raft trip down the Gila River the first week of May. I was very much impressed with the solitude of the area. For most of the journey, aside from the few other persons on the raft, the only other living creatures we encountered were cactus wrens in the walls by the river.

79-1 I feel very strongly that all 17,831 acres be designated as wilderness area. I am opposed to ORV use in that area. Such traffic destroys the true value of such an area as the Gila Box... no more solitude, no more cactus wrens.

The Gila Box is a valuable natural resource. I feel that only by designating all 17,831 acres as wilderness area, can this resource be preserved.

Sincerely,
S. Lee Spencer

RESPONSE — LETTER 79

79-1 See Response 1-2.

80

MARC S. WALTER, PH.D.
Clinical Psychologist
1115 East Marlette Avenue
Phoenix, Arizona 85014

8/23/83

District Manager, BLM
425 E. 4th St.
Safford AZ 85546

Dear Sir —

I am writing in support of having all 17,831 acres in the "Gila Box" area declared a wilderness area.

I rafted down the San Francisco/Gila Rivers in May 1983. It was an unusual experience for me for AZ rafting because it was so quiet. The lack of vehicular noise, especially ORVs, was enjoyable and increased the serenity and quality of the experience.

I was very thrilled to see a number of birds I'd not seen before, including what might have been a black hawk, as well as some good-sized rattlers — one even going for a swim.

I hope that this beautiful area can be designated a wilderness + that ORVs will be kept out —

Sincerely,
Marc Walter

81

1601 W. Dawn Drive
Tucson, Arizona 85704
August 24, 1983

District Manager, BLM
425 E. Fourth Street
Safford, Arizona 85546

Dear Sir or Madame:

After spending a weekend rafting down the Gila River, through the Gila Box, I am in favor of wilderness status for the 17,831 acres of the Gila Box.

The Gila River from Safford to Clifton, although not laden with rapids, offers a visitor a rare look at Southeastern Arizona before growth took its toll. The Gila River is one of the last flowing rivers in Southern Arizona. Gone are the Rillito and the mighty Santa Cruz. I moved to Tucson too late to see them flowing. I feel wilderness status would save the Gila Box area from the same fate.

Rafting or innertubing on the Gila River is such a lovely day of solitude, of serenity. Hiking the dry Gila in the fall, one longs for the river, but marvels at the lush fall vegetation. The changing and varied geology of the Gila Box area sends you home to learn more about the origins of the area.

The Gila Box area is Southern Arizona's escape from the desert -- an easy weekend trip from Tucson. The pristine beaches and the elegant overhanging mesquite and cottonwood trees make for delightful campsites. From the felled cottonwood at Eagle Creek, to the Indian ruins overlooking the junction, The Gila reflects its past. The abandoned Phelps Dodge Corp. mining equipment helps take you back. The many Indian ruins have not been excavated and offer a rare opportunity to touch, to feel and to discover the past.

The Gila River as it runs through the Gila Box area, is not a mighty river compared with the Klamath River in Northern California or the Salmon and Snake rivers in Western Idaho, but it is a family river. It is safe for children to explore. They stalk the elusive rattler that they had seen overhanging the river as though getting a drink, and they sport such pride when they sport the rare Black Hawk. With its varied terrain, the Gila Box area gives the visitor a rare chance to see the mixing of the old and the new Sonoran Desert.

Page 2

81-1 Compared with other river trips on the Klamath, the Snake and the Salmon, the Gila calm fills you at the others can not. The Klamath is hampered by a road that follows the river, and the Snake pits motorized vehicles against the rubber rafts and innertubes. The Salmon often is plagued by the release of water from dams. The Gila doesn't have these hinderances and by permitting off-road vehicles in the area, the solitude would be spoiled here too. The Gila Box terrain can be damaged too easily by off-road vehicles maybe more so than the damage to a quite float down the river. Granted, the Gila Box area is not the Grand Canyon. But the Grand Canyon is not assessible to overnight campers without reservations. And a guided raft trip, including meals and equipment cost more than $1,000 as compared with about $100 for the Gila Box. The Gila Box area can be explored in all seasons and on any budget.

The government has saved the saraugos by creating the Saraugo National Monuments. Please save the Gila Box area by granting it wilderness status.

Thank you for your consideration.

Sincerely,

Debbie Kornmiller

Debbie Kornmiller

RESPONSE — LETTER 81

81-1 See Response 1-2.

82

UPPER GILA RIVER ASSOCIATION
UGRA
ARIZONA NEW MEXICO
P.O. BOX 1449
SAFFORD, ARIZONA 85546

August 19, 1983

District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Sir:

On behalf of the Upper Gila River Association, I have reviewed the June, 1983 Safford District Draft Wilderness Environmental Impact Statement with particular emphasis on the Gila Box 4-22/23/24 (A) and Turtle Mountain 4-22/23/24 (B) units.

The Upper Gila River Association agrees with and supports the proposed action as presented in the DEIS of non-wilderness, multiple use designation for the Gila Box and Turtle Mountain units. We believe that through proper use management, not use restriction, the public can be best served by maintaining the current multiple use management strategy for these BLM lands.

Sincerely,

Kenyon Udall

Kenyon Udall
Chairman
Upper Gila River Association

KU:sb

83

UNITED 4 WHEEL DRIVE ASSOCIATIONS

STUART A. BENGSON
8900 N. Camino De Anza
Tucson, AZ 85704

To: Lester K. Rosenkrance, District Manager
Safford District Bureau of Land Management - USDI
425 E. 4th St.
Safford, AZ 85546

Dear Mr. Rosenkrance:

I am writing in support of your decision to not designate the "Gila Box" and "Turtle Mountain" WSA's "wilderness" and retain these areas in multiple-use. I fully agree with you in your judgement that designating these WSA's "wilderness" would have a severe impact on other resource uses and limit recreational opportunities. I also agree with you that these other resource values far exceed any "wilderness" values that may exist.

You are absolutely correct in your assertion that multiple-use of the resources of these two areas can occur without any damage to the environment or any "wilderness" values. Under the professional management capabilities of your office and existing regulations all resource values can be properly protected.

When all these factors are taken into consideration it is clearly evidant that logic and sound professional reasoning prevailed in your decision. Although some areas in the Safford District may warrant "wilderness" protection status, these areas are clearly areas that can be managed and utilized for the benefit of a majority of the public and not just a few.

Thank you for keeping the "Gila Box" and Turtle Mnt." areas open for multiple-use and the enjoyment of the public.

Sincerely

Stuart Bengson

TUCSON ROUGH RIDERS
member of : AZ State Assoc. 4WD Clubs
UNITED Four Wheel Drive Assoc.

CCto: Dean Bibles, State Director, BLM-USDI, 2400 Valley Bank Center, Phoenix 85073

84

8/21/83

Lester Rosenkrance
Safford District Manager - BLM
425 E. 4th St.
Safford, AZ 85546

Dear Sir:

Please record my letter in your official hearing files on the DEIS of your Wilderness Study Area.

84-1

I am a resident of Arizona although I have recently taken a nine month job in Hawaii. I urge you to realize that the Gila Box wilderness is a precious habitat for a number of animals (ie the peregrin falcon, the black hawk). Off road vehicular traffic is a proven deterrent to the natural balance of animal behavior. ORV are, simply, in direct contradiction to a philosophy of preservation of wilderness. Allowing ORV access is the fastest way to degrade the natural beauty of the Gila Box area.

We must consider the enjoyment of future Arizonans as well. True wilderness areas are rapidly diminishing in quality and number and I wish to voice my strong support for the 17,831 acres of Gila Box wilderness.

Sincerely,

Christina Neal

RESPONSE — LETTER 84

84-1 See Response 1-2.

85

August 25, 1983

Mr. Lester K. Rosenkrance
Bureau of Land Management
Safford District
4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

Having reviewed your wilderness study areas we agree with your recommendations on the Turtle Mtn., the Gila Box, the Javelina Peak and the Peloncillo Mtns. remaining under the multiple use access concept. These areas should not be considered for restricted use..

85-1 Furthermore, the Needle's Eye, Black Rock, Fishhooks and the Happy Camp areas should also be kept under the multiple use concept. Proposed wilderness designation does not allow for intensive grazing and therefore renders a great amount of acreage non-productive.

85-2 All of the proposed areas should remain as free access areas and as multiple use areas.

Sincerely,

Cochise-Graham Cattle Growers Association

L E Moore Jr

L. E. Moore, Jr.
President

cc: Arizona Cattle Growers Assoc.

RESPONSE — LETTER 85

85-1 See Response 16-2.

85-2 The areas recommended for wilderness will continue to be accessible to the public. Access will not be permitted by motorized vehicle but very little of the recommended areas can be traversed by vehicle. The areas are too rugged to permit vehicle travel without road construction. While management emphasis in these areas will be on the wilderness resource, BLM will continue to manage the recommended wilderness areas for a variety of other multiple uses that will not degrade the wilderness character. These include livestock grazing, wildlife, cultural resources, outdoor recreation and watershed.

86

August 25, 1983

Mr. Lester K. Rosenkrance
District Director
Bureau of Land Management
Safford, Arizona 85546

Dear Mr. Rosenkrance:

We are opposed to the Black Rock Mountain Area being designated as Wilderness, Area of Critical Environmental Concern, Outstanding Natural Area or any other type of Protective Management.

86-1 The Black Rock area has always been prime cattle producing country and any of the above designations would take it out of intensive grazing management. With approximately 70,000 acres already set aside under Primitive, Wilderness and Roadless designation in Graham County we have enough land taken out of intensive production.

Sincerely,

COCHISE-GRAHAM CATTLE GROWERS ASSOCIATION

L E Moore Jr

L. E. Moore, Jr.
President

cc: Arizona Cattle Growers Assoc.

RESPONSE — LETTER 86

86-1 See Response 16-2. Identical letters were sent by two separate individuals.

87

All signatures on the following pages have read the letter of protest before signing their names and agree with it

Chloe H. Dryden
118 Relation st
Safford Ariz 85546

In protest to the listed area.

To whom it may concern:

Wilderness, roadless and undeveloped area
U.S. Forest Service and Bureau of Land Management

Coronado National Forest Santa Teresa Mts. Black Rock Area	Bureau of Land Management AZ-4-8 Black Rock Area
R.B. Tippiconnic Cecil R. Sims 301 West Congress Tucson, AZ 85701	District Manager Lester Rosenkrane 425 E. 4th St. Safford, AZ 85546

We are the Holladay and Dryden families of the area listed above and are residing there now and have for many years. We are opposing both the U.S. Forest Service and the B.L.M. putting the land into wilderness, roadless areas.

87-1 Our past legal history show the families were using it before the government put U.S. Forest Service and B.L.M. boundaries up. We have not received any legal statement that it will not cut our grazing priviledges.

87-2 Our patented land is in the middle and connects the Forest Service and the B.L.M. land. The wilderness in that area cannot be reached without crossing or parking on our private property. No buffer zone area, between our land on listed areas has been set aside. We have to cross the last mineral strips that Udall gave back to the Indians, and there is no guarantee they won't close the road or even let us maintain it.

There is no need for a wilderness, roadless area to be established, because nothing can be done on the land without permission from the Forest Service or the B.L.M.

The general public doesn't know we have any private land out there or any legal rights.

Sincerely,

Volley Dryden
Volley Dryden

Chloe H. Dryden
Chloe Dryden

Franklin H. Holladay
Franklin H. Holladay

RESPONSE — LETTER 87

87-1 See Response 16-2. This statement was signed by 317 separate individuals. The list of signatures is not reproduced but is available for review at the Safford District Office.

87-2 The Black Rock road provides the primary access to public lands in the Black Rock area and the eastern portion of the Coronado National Forest. Black Rock is recommended suitable for wilderness to complement the contiguous Forest Service Santa Teresa Wilderness. If the Black Rock WSA is added to the Santa Teresa Wilderness, access to the area will be available from the south and west as well as the Black Rock road. The only access to the wilderness would not be across private land. Thus the potential visitor-related problems discussed above could be further resolved through controlled routes of access to the wilderness. Since Black Rock road is not part of the area under consideration for wilderness, travel on the road would not be restricted by wilderness management. Travel would continue regardless of wilderness designation or nondesignation.

In providing access to private property, public lands and the National Forest, the Black Rock road crosses approximately five miles of the San Carlos Indian Reservation. The private property owners fear wilderness designation will lead to substantial increases in visitor use and will increase visitor-related problems as discussed above. They fear increased visitor problems will cause the Tribe to close the road across the Reservation and thus to their privately owned land. BLM requested the Department of Interior Field Solicitor to determine whether the Tribe could legally close the road where it crosses the Reservation. It is the Solicitor's opinion that the Tribe cannot close a Bureau of Indian Affairs (BIA) road, only the Indian Commissioner can under the reasons set forth in 25 CFR 170.8(a).

The Black Rock road is listed on the BIA road system and has been periodically maintained by the BIA with Federal funds. According to Section 170.8(a), Code of Federal Regulations, Title 25:

> Free public use is required on roads eligible for construction and maintenance with Federal funds.··

Only the Indian Commissioner can restrict use or close BIA roads when required for (1) public safety, (2) fire prevention or suppression, (3) fish or game protection or (4) to prevent damages to an unstable roadbed.

88

NELSON COLLAMER FOUNDATION, INC.
P. O. BOX 7258 • MESA, ARIZONA 85206 • 602-832-0021

August 25, 1983

District Manager, B.L.M.
425 E. 4th St.
Safford, Ariz. 85546

Dear Sir:

It has been my good fortune to have spent some time recently in the Gila Box area and I would like to take this opportunity to express my concern over its proposed wilderness designation. I am in favor of the proposal to include all 17,831 acres as wilderness.

Having moved to Arizona from Oregon last year, I have a keen sense of the importance of preserving our riparian areas. What is so plentiful in Oregon is extremely rare and more fragile in Arizona. I have spent time on some of Arizona lakes, but missing is the feeling of quiet solitude found in the Gila Box.

88-1 In addition to a wilderness designation for the entire 17,831 acres, I am also in favor of retracting the grazing permits so that the young cottonwood trees may have a chance to mature thereby providing needed habitate for the endangered black hawks and other predatory birds.

Arizona has abundant area for O.R.V. use, I see no need why it has to include the precious Gila Box.

Sincerely,
Noel Collamer
Noel Collamer

RESPONSE — LETTER 88

88-1 See Response 45-1.

89

to:
Mr. Rosenkrance,
Safford District Manager
BLM
425 E 4th St
SAFFORD, AZ 85546

I support the 17,831 acres for full wilderness designation of the Gila Box area.

I've lived in Arizona since 1948, arriving as a 3rd grader here in Tucson with my mom, dad, brother, and sister. I've grown up in Southern Arizona, camped, hiked, and worked in our area.

I know that this area is a perennial stream, and as such, is critical for all of us to keep for Southern Arizonans. I teach elementary school, and love the idea of students' opportunities to study the geology, Indian pre-Columbian sites, river/landform interaction, wildlife development.

89-1 I'm aware that off road vehicles are a distinct menace to all this. Lack of control of vehicles roaring upriver and up the banks seems dangerous,

89-1 uncertainty of the amount of these vehicles seems threatening, questionable amount of noise levels disrupting falcon, southern eagle, and bald eagle seems obscene, 99.5% of land use in the area already by the ORVs seems exceedingly generous (Does 17,000 less acres lead to a deprived way of life for these drivers?).

Our Southern Arizona heritage - visits to friends in Willcox, weekend excursions into Safford, drives along 4-mile creek, drives up Mt. Graham, permissions into Aravaipa, Reddington area weekends, Mt. Lemmon picnics - all years to add the full wilderness of the beaver, eagle, Indian sites, Eagle peak, sandstones, falcons, the Chihuahua and Sonoran Deserts, gentleness and loneliness suitable for schoolchildren and my retired Dad.

Thank you.

Yours, Richard Carter
1439 S. JONES D-9
TUCSON, AZ. 85713

RESPONSE — LETTER 89

89-1 See Response 1-2.

90

Dear Sir,

We are writing to let you know we are opposed to the 2 areas in Graham + Greenlee - (Gila Box + Turtle Mt) - being turned into wilderness areas.

It seems to us that this land is for the people. So many of our freedoms and rights are being taken away and now you want to take away our family pleasures of going to the mountains and hiking, fishing + camping. The wilderness is for the people and you are trying to take it away. How can we enjoy it if we can't go up there and use it. We understand having restrictions put on areas to protect the wildlife but it is wrong to take it away from us altogether. This is suppose to be our country so let us have a say once in awhile.

Sincerely,

Randy + Ray Bennett

91

August 25, 1983

Dear Mr. Rosenkrance,

We want you to know we oppose to more restrictions in refference to Gila Box 4-22/23/24 "A" and Turtle Mountain 4-22/23/24. If you need to know why we will send you a lengthly letter.

Thank You,

Mr + Mrs John Wayne Lewis
Rt. 1 Box 480
Safford, AZ 85546

92

Safford-Graham County
CHAMBER OF COMMERCE

August 24, 1983

Lester Rosenkrance
District Manager
Bureau of Land Management
425 East 4th St.
Safford, Arizona 85546

Dear Mr. Rosenkrance:

The Safford-Graham County Chamber of Commerce support the recommendation of the Safford District Bureau of Land Management Director to maintain multiple use of the Gila Box and Turtle Mountain Wilderness Study Area Units. We agree that these areas do not meet the criteria for inclusion into the wilderness system and that wilderness designation would be detrimental to Greenlee County and its citizenry. We feel that these areas should be managed for multiple use to obtain the best mix of recreation, ranching, flood control and other uses.

Sincerely,

Robert E. Gentry

Robert E. Gentry
Executive Director

reg:bej

1111 Thatcher Blvd. Safford, Ariz. 85546 Phone (602) 428-2511
"Arizona's Hidden Treasure"

93

EMIL CROCKETT AGENCY, Inc.
GENERAL INSURANCE
427 MAIN STREET •FIRE •AUTO •CASUALTY •BONDS TELEPHONE (602) 428-3840
SAFFORD, ARIZONA 85546

LESTER K. ROSENKRANCE, DIST. MGR.
BUREAU OF LAND MANAGEMENT
425 EAST 4TH ST.
SAFFORD, AZ. 85546

DEAR MR. ROSENKRANCE:

I JUST WANTED TO WRITE YOU A BRIEF LETTER TO LET YOU KNOW THAT I AM MOST APPRECIATIVE OF THE FACE THAT YOU SUPPORT KEEPING THE CAMELSBACK DAM SITE OUT OF THE WILDERNESS PROJECT.

IT SEEMS TO ME THAT THERE ARE PLENTY OF REMOTE AREAS THAT COULD BE CLASSIFIED AS WILDERNESS AREAS (ESPECIALLY FOR THE NUMBER OF PEOPLE WHO CAN USE SUCH AREAS) WITHOUT HAVING TO TAKE LAND WITH SUCH IMPORTANT POTENTIAL FOR FLOOD CONTROL.

I UNDERSTAND THAT THERE ARE THOSE IN FAVOR OF PUTTING EVERYTHING THAT THEY CAN GET INTO WILDERNESS AREAS--ALTHOUGH I NEVER UNDERSTAND WHY OR WHO THEY ARE THAT SUPPORT SUCH MOVEMENTS. SURE, WE SHOULD HAVE SOME SUCH AREAS BUT WHY SO MUCH.

SINCERELY,

YOUR Independent Insurance AGENT

94

August 22, 1983

Dear Les Rosenkrance',

I support the designation of ~~17,08[illegible]~~ 17,831 acres of the Gila box for full Wilderness designation.

As an ex-employee of the BLM as a hydrologic aide, I am familiar with the importance of maintaining riparian areas, ~~Because so~~ both in a hydrologic sense and for a wildlife habitat. When ORU's invade these areas, they destroy seedlings, which ~~destr ruins~~ degrades the riparian area, and ruins the wildlife habitat. In addition, the cumulative effects of ORU use is not known; apparently nothing ~~in~~ ~~[illegible]~~ on these effects on the area is contained in the EIS, perhaps a negligent situation. Especially in the arid Southwest, it is important to not only maintain existing riparian areas, but actually improve these areas → because of this I support ~~the~~ replanting cottonwoods in this area, if replanting doesn't disturb the areas (i.e. by needing trucks to bring trees in). For these reasons I urge you to reconsider the preferred alternative in the Draft wilderness EIS for the Safford District. 94-1

Thank you

Sincerely, Adam Klein

Candidate for M.S. in Watershed Management,
C/o Graduate School, Renewable Natural Resources
University of Arizona, Tucson AZ, 85721

RESPONSE — LETTER 94

94-1 See Response 1-2.

95

Mr. Rosenkrance
Safford District Manager
BLM 425 E 4th St.
Safford, AZ 85546

The 17,831 acres of the Gila Box proposed for
full wilderness designation would preserve one of the last
intact riparian areas in the state of Arizona. This would
protect a unique ecological area, one in which many
species of rare and uncommon birds, reptiles and plants occur
including the southern bald eagle, and black hawk are found.
The Chihuahuan and Sonoran desert are both found in this
95-1 area, with a unique overlap of flora and fauna. In the spring
of 1982 several people on two different raft trips, including
members of the Audubon Society spotted ~~two~~ river otters which have
not been seen in this state for years. Despite ~~Stony~~ having the
Heritage Program verifying this siting, their presence was not
reported in the EIS filed on this area.

I am fully in favor of having the Gila Box become a
95-2 wilderness Area. This would preserve the area from the disrupt
presence of ORV's, which destroy the riverbottom, stream banks, side
canyons, seedling cottonwoods, disrupt the black hawk & other birds
nesting sites & pollute the area with both auto exhaust and noise.
This area should instead be a place of quite & solitude, where one
can relax & forget the worries of everyday life. So little areas
are left today, where people can get away from the mechanized
urban world, and reestablish his contact with nature.

Thank you
Patricia Schmidt

RESPONSE — LETTER 95

95-1 The BLM was not aware river otters were present in the Gila Box. When public comment identified sightings of the river otter, the district contacted the Arizona Natural Heritage Program (now the Arizona Game and Fish Department's Non-Game Branch) to confirm the reports. The Heritage Program did not confirm the reported sightings.

95-2 See Response 1-2.

96

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

Ecological Services
2934 W. Fairmount Avenue
Phoenix, Arizona 85017

August 24, 1983

MEMORANDUM

To: State Director, Bureau of Land Management, Arizona State Office, Phoenix, Arizona

From: Field Supervisor, Fish and Wildlife Service, Ecological Services, Phoenix, Arizona

Subject: Review of Draft Environmental Impact Statement (DEIS) Safford District Proposed Wilderness Program, Bureau of Land Management, Arizona-New Mexico

We have reviewed the subject DEIS which encompasses Cochise, Gila, Graham, and Greenlee Counties, Arizona and Hidalgo County, New Mexico, and offer the following comments.

General Comments

Our previous comments on the Wilderness Study Areas (WSA) was provided to your Safford District Manager on June 23, 1982. In that memorandum we supported the "All Wilderness" alternative because of its benefits to fish and wildlife and recommended acquisition of Eagle Creek to include the entrance to a bat cave for the Gila Box WSA. The information presented in this DEIS reinforces our previous position and we again recommend the "All Wilderness" or the "Enhanced Wilderness" alternatives rather than the more limited "Proposed Action".

96-1 We are particularly concerned that neither the Gila Box or Turtle Mountain WSA's were included in the proposed action. Both of these areas have vegetative types not represented in the existing National Wilderness Preservation System (Table 3-4, p. 26). We encourage emphasis of your criterion to expand the diversity of the national systems (p. 11).

Specific Coments

96-2 Pp. 19, 44, 74. On page 19 (Table 2-2), page 44 (Gila Box), and page 74 (Impacts to Wildlife) the point is stressed that wildlife would be adversely affected since wilderness designation would restrict broadleaf revegetation efforts. We believe this may not be entirely true, in consideration of the long-term impacts of off-road-vehicle use in riparian areas and the fact that there may be methods of accomplishing revegetation along stream courses without using motorized vehicles. For example, rafts were used by Tonto National Forest on Tonto Creek and by the Fish and Wildlife Service on the Rio Grande River.

96-3 Thus we find the summary of impacts for Wildlife in Table 2-2 misleading. It should also include your statement (from Impacts to Wildlife, p. 74) that "Wilderness designation would generally benefit wildlife and wildlife habitat."

96-4 Pp. 27, 44-45. We appreciate your concern for both Federal and State listed threatened and endangered wildlife and plant species. You may wish to add to the "Category" listing in Table 3-9 (p. 44) the Federal designation of "Candidate Species" (from Federal Register December 30, 1982) for loach minnow, Gila monster, and razorback sucker. The plants listed as "Candidate Species" in Table 3-10 (p. 45) should be referred to as "Review Species". Under Section 7 consultation of the Endangered Species Act, you may wish to request an updated list of listed, proposed, and candidate species from this office.

P. 82. Your section on mitigating measures available to protect resources of the WSA's not designated was encouraging and informative. We sincerely hope action will be taken along those lines to protect nondesignated areas.

Summary

For reasons presented in your document, we encourage designation of more wilderness than is included in the proposed action. The proposed action includes only 26% of the WSA's and approximately 2% of the Safford District.

cc: Director, Arizona Game and Fish Department, Phoenix, Arizona
District Manager, Bureau of Land Management, Safford, Arizona
Regional Director, (AHR, SE), Fish and Wildlife Service, Albuquerque, New Mexico
Chief, Office of Environmental Coordination, Fish and Wildlife Service, Washington, DC

RESPONSE — LETTER 96

96-1 Expansion of the diversity of natural systems in the National Wilderness Preservation System (NWPS) was given emphasis in our study and EIS. This part of Criterion No. 1 — Evaluation of Wilderness Values was applied to each WSA under study. While neither the Gila Box or Turtle Mountain WSAs are recommended for wilderness, the vegetation type present and not currently represented in the NWPS is also present in the Fishhooks WSA which has been recommended for wilderness designation.

96-2 You are correct in saying there are other nonmotorized methods of replanting the river course. An ORV group has volunteered their services and BLM is also using the help of other nonmotorized individuals or group volunteers. It should be pointed out that while plantings can be accomplished by volunteers using rafts, the periods of the year when the waters are lowest are those times when watering the trees is required. This is most easily accomplished by vehicles using the river channel or by foot. Both methods have been used. If damage occurs as a result of ORV use, BLM will control use to an acceptable level.

96-3 See text, Chapter 2.

96-4 See text, Chapter 3.

97

ARIZONA MINING ASSOCIATION
100 WEST CLARENDON • SUITE 1720 • PHOENIX, ARIZONA 85013 • (602) 266-4416

C. J. HANSEN
President

August 25, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

Attached please find the Arizona Mining Association's comments on the Draft Environmental Impact Statement (EIS) for the wilderness designation of study areas in the Bureau of Land Management's Safford District, Arizona. The members of the assocation believe that the Draft EIS is deficient in several respects. However, our analysis of the literature, the Draft Environmental Impact Statement report and the Association members' familiarity with the areas have resulted in our conclusion that the Arizona Mining Association can support the Proposed Action alternative with specific exceptions. We find the Bureau of Land Management's other alternatives to be unacceptable.

In summary, the Arizona Mining Association recommends the following:

Needle's Eye (AZ-4-1A) -- deletion of western one-third of the Proposed Action alternative. Retain the middle and eastern portions.

Black Rock (AZ-4-8) -- deletion of entire WSA unit from further wilderness consideration.

Fishhooks (AZ-4-14) -- acceptance of the Proposed Action alternative.

Day Mine (AZ-4-16) -- deletion of the entire WSA unit from further wilderness consideration.

Gila Box (AZ-4-22/23/24(A)) -- deletion of the entire WSA unit from further wilderness consideration.

Turtle Mountain (AZ-4-22/23/24(B)) -- deletion of the entire WSA unit from further wilderness consideration.

Javelina Peak (AZ-4-48) -- deletion of the entire WSA unit from further wilderness consideration.

Peloncillo Mountains (AZ-4-60) -- deletion of the entire WSA unit from further wilderness consideration.

Happy Camp Canyon (AZ-4-65) -- acceptance of the Proposed Action alternative.

We appreciate the opportunity to comment on the Safford District Draft Wilderness Environmental Impact Statement and we hope that our comments will be seriously considered.

Yours very truly,

C. J. Hansen

C. J. Hansen
President

CJH/jg

Attachment

Comments of
the Arizona Mining Association
on the Bureau of Land Management
Safford District Draft Wilderness
Environmental Impact Statement

Prepared by the
Lands Subcommittee of the
Arizona Mining Association
Phoenix, Arizona

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Executive Summary

In addition to the Arizona Mining Association's general comments on the Safford District Draft Wilderness Environmental Impact Statement, the following are the conclusions of the Association on the individusl wilderness study areas in the Safford District. Specifically, the Association feels it can support the Proposed Action alternative, with exceptions. The detailed analyses of each wilderness study area in the Safford District is presented in the report.

Needle's Eye (AZ-4-1A)

The Arizona Mining Association recommends that the western one-third of Proposed Action boundary be deleted and that the middle and eastern two-thirds be retained for further review in the wilderness study program.

Black Rock (AZ-4-8)

The Arizona Mining Association recommends that Black Rock WSA be dropped from the wilderness inventory and reassume a multiple use classification open to resource development under the guidelines of existing statutes.

Fishhooks (AZ-4-14)

The Arizona Mining Association agrees with the Safford BLM on the boundaries of the Proposed Action alternative that deletes the lower one-third of the Fishhooks WSA.

Day Mine (AZ-4-16)

The Arizona Mining Association recommends that the Day Mine WSA be dropped from the wilderness inventory and reassume a multiple use classification open to resource development under the guidelines of existing statutes.

Gila Box (AZ-4-22/23/24(A))

The Arizons Mining Association strongly recommends that the Gila Box WSA be dropped from the wilderness inventory.

Turtle Mountain (AZ-4-22/23/24(B))

The Arizons Mining Association strongly recommends that Turtle Mountain WSA be dropped from the wilderness inventory.

Javelina Peak (AZ-4-48)

The Arizona Mining Association strongly recommends that Javelina Peak WSA be dropped from further consideration in the wilderness inventory program.

Peloncillo Mountains (AZ-4-60)

The Arizona Mining Association supports the decision of the Safford BLM District office under the Proposed Action alternative to drop the Peloncillo Mountains WSA from further consideration in the wilderness inventory program.

Happy Camp Canyon (AZ-4-65)

The Arizona Mining Association supports the boundaries shown on the Happy Camp Canyon WSA under the Proposed Action alternative although we question the manageability of this unit due to its small size and distance from the district BLM headquarters.

Introduction

The Arizona Mining Association has developed this report in response to a request for comments on the Safford District Draft Wilderness Environmental Impact Statement. In general, we support the conscientious effort put forth by the Safford District in developing this impact statement. Throughout the Bureau of Land Management Wilderness Study Process the Safford District has been the State's leader in their analysis of potential wilderness areas. Even though the overall EIS is well conceived, the Arizona Mining Association has identified some deficiencies in the report that are presented herein.

The Arizona Mining Association consists of 17 major mining companies in Arizona that produce most of the copper, gold, silver and molybdenum in the State. We, as well as the aware public are concerned about the continuing actions of the Federal government to remove and restrict public lands from productive use prior to a thorough evaluation of the mineral potential of the areas being withdrawn.

Arizona is a mineral storehouse and plays a significant role in meeting the Nation's mineral needs. For many years, Arizona has been the premiere metal producing state in the Nation, and in 1981, Arizona's mining industry produced 68 percent of the Nation's newly mined copper, one-quarter of the Nation's molybdenum, one-fifth of the Nation's silver and over one-tenth of the Nation's gold.

Not only is Arizona the mainstay of the Nation's mineral storehouse now, it also will be relied upon heavily in the future to provide a large portion of the United States' copper, molybdenum, silver and gold. The U.S. Bureau of Mines has reported that Arizona contains 85 percent of the United States' copper reserves and 20 percent of its molybdenum reserves, as forecasted well into the 21st Century. As a result, the State will play a significant role in meeting the Nation's mineral and energy independence goals in the future and it is expected that mining will be a prominent force in the future growth of the State's economy. However, discovery and development of many of these resources is dependent upon access to federally-controlled lands (70 percent of the State) where these minerals often occur. And unfortunately, minerals in Arizona have seldom received serious and timely consideration in land use planning. That is why the Arizona Mining Association is concerned about the Safford District Draft Wilderness Environmental Impact Statement.

The adequacy of the consideration given to mineral values and concerns in this Draft EIS is a significant improvement over other Arizona wilderness study environmental impact statements we have reviewed. Nevertheless, deficiencies do exist which must be corrected to produce an adequate final environmental impact statement in compliance with the National Environmental Policy Act ("NEPA").

Vested Rights

97-2 The Arizona Mining Association feels that the Draft EIS is deficient by the failure of the Bureau of Land Management to include any mention of the recent decision by the Interior Board of Land Appeals in IBLA 81-811 and IBLA 81-1072, decided May 6, 1982, at 64 IBLA 27. In this decision, the Interior Board of Land Appeals ruled that federally-owned surface estates in the wilderness review program which overlies Santa Fe Pacific Railroad Company's fee mineral estate:

> . . . are so encumbered by "vested rights" including a dominant right of use of the federally-owned surface, as to put them beyond the legal authority of the Secretary to manage for their protection and preservation a wilderness.
>
> We conclude that where the Secretary lacks the legal authority to manage lands for their protection and preservation as part of the permanent wilderness system, such lands shall be excluded from the wilderness review process.

97-2 The decision of the Interior Board of Land Appeals is of particular importance in light of the proposed action with respect to Black Rock WSA and Happy Camp Canyon WSA to include 545 acres and 122 acres respectively of non-federal mineral lands within the boundaries of these proposed wilderness areas. (See Draft EIS pages 16 & 18). It was apparently with this decision of the Interior Board of Land Appeals in mind that the Secretary of the Interior recently took action to eliminate certain lands from Black Rock WSA and Happy Camp Canyon WSA. See 48 Fed. Reg. 36,294 (1983).

BLM's failure to advise the public of the mandate imposed on it by the Interior Board of Land Appeals is a serious omission from the Draft EIS which should be corrected in the final EIS.

GEM Resource Assessment

The Bureau of Land Management Policies, Criteria and Guidelines for conducting Wilderness Studies on Public Lands (47 FR 5098, February 3, 1982) contains the following directives:

1. Energy and mineral resource values and potential will be identified by BLM mineral resource specialists for WSAs through the use of the BLM's established Geology-Energy-Mineral (GEM) resource assessment procedures. The BLM will use its GEM resource assessment to identify the potential of the WSAs, or specific portions thereof, for occurrence of energy and mineral resources by type of commodity.
2. Recommendations as to an area's suitability or nonsuitability for wilderness designation will reflect a thorough consideration of any identified or potential energy and mineral resource values.
3. In determining whether an area is suitable or nonsuitable for wilderness designation, the BLM will give special attention to adverse or favorable social and economic effects, as identified through the wilderness study process, which designation of the area would have on the local areas.

97-3 It is evident from a reading of the Draft EIS that while these directives were known to BLM personnel, they were not followed by the BLM personnel involved in the preparation of the statement and that the Geology-Energy-Mineral (GEM) assessment procedures were not applied to the study. For instance, there is no indication in the Draft EIS as to whether BLM mineral resource specialists were personally involved in the geology, energy and minerals resource assessment as required. See 47 FR at 5099. See also Draft EIS at 36. Moreover, the Draft EIS fails to give any indication of the credentials of non-BLM individuals who in fact performed the mineral evaluation found in the Appendix to the Draft EIS. Since these directives were not followed and, in view of the inadequate consideration of mineral data, no conclusion can be reached other than the Safford District Draft Wilderness Environmental Impact Statement does not meet the standards required for such a

97-3 document. The Arizona Mining Association recommends that the Draft EIS be redone to properly treat mineral resource information and potential.

U.S. Mineral Policy Acts

97-4 Another defect in this Draft EIS is in its failure to comply with the Council on Economic Quality regulatory requirements to consider the conflicts between this proposed action and other national policies. 40 CFR 1502.16(c). The Mining and Minerals Policy Act of 1970 and the National Materials and Minerals Policy, Research and Development Act of 1980 require the Secretary of the Interior, when exercising his authority under other laws, to carry out the policy of the federal government to encourage the development of the economically sound and stable domestic mining industries. Proposing the closure of these areas to mining by wilderness designation is in conflict with this policy and this conflict must be considered in the EIS.

Cumulative Withdrawals

97-5 Related to the failure to consider conflicts with other national policies is the failure to consider the cumulative effect of the proposed action on land availability for resource uses in Arizona. The Council on Environmental Quality ("CEQ") regulations require these cumulative effects to be considered. 40 CFR §§ 1502.16, 1508.8 and 1508.7. Existing or designated wilderness areas in Arizona total some 997,221 acres. In addition to this 997,221 acres of wilderness, it has been determined that approximately 33 million acres (two-thirds) of federal lands in Arizona are unavailable or highly restricted to mineral resource development by other withdrawals including BLM Wilderness Study Areas, Forest Service RARE II Areas, Primitive Areas, Scenic Areas, Game Preserves and Refuges, Parks and Monuments, Defense Department Withdrawals and numerous other withdrawals. Each of these categories has been formed by individual periodic withdrawal action with little or no consideration being given to the cumulative affect of all of the withdrawals. It is this cumulative effect which must be addressed and considered in this EIS. 97-5

Mineral Survey

97-6 The Draft EIS improperly states that only *after* areas are recommended for wilderness must further mineral surveys be conducted by the U.S. Geological Survey and by the U.S. Bureau of Mines. (Draft EIS at 36). This statement and proposed procedure is clearly not in conformity with the procedures set forth in Section 603(a) of the Federal Land Policy and Management Act ("FLPMA"). Section 603(a) states: "That *prior* to *any* recommendations for the designation of an area as wilderness the Secretary *shall* cause mineral surveys to be conducted by the Geological Survey *and* the Bureau of Mines to determine the mineral values . . . that may be present in such areas . . . ." It is clear, therefore, that such a mineral survey must be conducted before any recommendation is made as to the wilderness suitability or non-suitability of any wilderness study area within the Safford District.

Impacts to Wilderness Values

97-7 The discussion of the impacts to wilderness values of the WSAs on page 2 and Table 2-2 indicate that if the WSAs are left open for mineral activities, wilderness values of the Gila Box and Happy Camp Canyon WSA's would be impaired.

This assertion ignores the fact that, based upon customary exploration and development practices in Arizona, only a small fraction of these areas would even be touched by any mineral activity. Of the total 72.7 million acres in Arizona, which has historically produced two-thirds of our nation's copper, only 194,000 acres or 0.27 percent has been affected by mining activity. Further, most areas which are affected are touched only by exploration activities which are easily rehabilitated. The EIS should at least recognize that the extent of disturbance caused by both hardrock and leasable mineral activities can be closely controlled by the BLM regulations applying to those activities.

Impacts to Minerals and Energy

The discussion on pages 2 and 66 of the impacts to minerals and energy of wilderness designation indicates that wilderness designation would have a "significant adverse impact" on mineral "exploration" under "all" alternatives except the *no wilderness* alternative *and* would have a "significant impact" on energy "exploration" under the *all wilderness* alternative. This is an important and accurate assessment by the BLM. At the same time, however, the discussion on page 2 states that the *all wilderness* alternative would "probably" have adverse impacts on mineral and energy "development." Moreover, the discussion states that all other alternatives involving any wilderness designation would "possibly" have adverse impacts on energy "exploration *and* development."

97-8 It is submitted and asserted by the Arizona Mining Association that these statements are inconsistent one with another and that the data set forth in the Draft EIS establishes clearly that wilderness designation will *in fact* have significant adverse impacts on mineral and energy exploration *and* development and, therefore, upon the regional economy which the EIS finds is so heavily dependent upon mining. This discussion should, therefore, be altered to reflect this fact. The statement on page 2 that the *all wilderness* alternative would "probably" have adverse impacts upon mineral and energy development is clearly inaccurate and inappropriate. Indeed, pages 38 and 39 of the Draft EIS identify both actual and prospective geothermal resources in the Gila Box and Turtle Mountain, Fishhooks and Day Mine, and Javelina Peak WSA's. There is no question that these significant energy resources cannot be developed at the present time under an all wilderness alternative. Accordingly, the language of the Draft EIS should be altered to reflect this fact. 97-8

Mineral Development in Wilderness Areas

97-9 On pages 18 and 65 of the Draft EIS, statements are made that designating an area as wilderness would close that area to exploration and mining activities. We recognize that these statements are apparently based upon assumption number 9 on pages 2 and 65 that any area designated as wilderness will be withdrawn from appropriation under the mining laws. However, we believe that some discussion of the basis for that assumption should be made and that the assumption be qualified to indicate that it is not anticipatable with certainty that Congress will continue to withdraw public lands from mining by wilderness designation and by other withdrawals. Taking into account the present extent of public lands withdrawn from mining (approximately two-thirds of all public lands), the continuing rate of public land withdrawals, and the possibility of a national emergency, a point will be reached at which Congress will be

97-9 compelled to face the fact that this nation has already locked up excessive amounts of its resources and that Congress will no longer blindly prohibit mining and mineral leasing on lands described as wilderness. This study should not presume, without such qualification, that Congress will continue to ignore this reality at the time any lands within the Safford District are designated as wilderness.

Wilderness Management and FLPMA Sec. 603(a)

On page 18 of the EIS, the statement is made that the BLM manages the wilderness resource by complying with Section 603(c) of FLPMA, which statement is followed by a quotation of only a portion of that section. 97-10 In order to accurately reflect the requirement and authority of the BLM to manage WSAs and the limitations on that requirement and authority, all of the language relating to the management standards for WSAs as expressed in Section 603(c) should be included in the quotation.

Class I Air Quality Designation

97-11 Assumption number 11 on pages 2 and 55 of the Draft EIS should be qualified with the recognition that entities other than the BLM may recommend and cause the reclassification of air quality standards applicable to the wilderness areas from Class II to the more restrictive Class I. See 42 U.S.C. § 7474 (a). In fact, the Environmental Protection Agency has stated the likelihood that all wilderness areas will eventually be designated as Class I. (U.S. Environmental Protection Agency interoffice memorandum titled, "Changes to PSD and Emissions Offset Requirements," October 6, 1977). Similarly, on page 67 under the All Wilderness, Enhanced Wilderness and Moderate Wilderness discussion of the Gila Box, it should be recognized that potential future restrictions arising from wilderness designation such as PSD Class I or clean water requirement could have a disastrous effect on Arizona's largest copper mine at Morenci.

Economic Conditions

It is submitted that the Draft EIS contains internal inconsistencies and inadequate data regarding the economic impact of wilderness designation on Gila, Graham and Greenlee counties. This is especially true with respect to Greenlee County.

The discussion of the economic conditions of Greenlee County at page 49 identifies the mining industry as the "primary" employer of the residents of Greenlee County. The discussion properly characterizes the economy of Greenlee County as "dependent" upon a "single industry -- mining." Moreover, at page 2 of the Draft EIS, BLM appropriately concludes that wilderness designation would have a "significant adverse impact" on mineral exploration. In addition, at pages 3 & 77 of the Draft EIS, BLM states that all areas designated wilderness would receive a "VRM Class I" designation restricting or prohibiting any activities that "might" impact the landscape.

97-12 The Draft EIS fails to set forth any of the following facts establishing the clear detrimental economic effect wilderness designation will have on the mining industry and Greenlee County: (1) The single largest employer in Greenlee County is the Phelps Dodge Corporation's Morenci operations which include the second largest open pit copper mine on the North American Continent, (2) The Morenci operation extends to within 330 yards of the existing boundaries of the Gila Box WSA,[1] (3) The entire Morenci area is located within an air quality non-attainment area for particulate matter (i.e. dust), and (4) Wilderness designation of Turtle Mountain and Gila Box WSA's will inhibit further expansion of the Morenci operations.

97-13 Rather, on page 79 of the Draft EIS the BLM states that the economics of wilderness designation on mineral development "are not known." Moreover, it is stated by way of conclusions that "none" of the wilderness alternatives would have "significant" regional economic impacts. These statements should be made consistent with an explicit recognition in the "Impacts to Economic Conditions" discussion beginning on page 77 that all except the no wilderness alternative would have a significant impact on regional economic conditions to the extent that wilderness designation will prevent new mineral development or impede current mining operations. Specifically, it is stated by way of conclusion on page 80 that wilderness designation of the Gila Box WSA "might" have "slight" adverse impacts on the local economy.

97-14 The Draft EIS, therefore, fails to discuss and contains no data concerning the major economic issue relating to wilderness designation of the Turtle Mountain and Gila Box WSA's -- the adverse impacts of wilderness designation on the Morenci mining and related operations and consequently the entire economy of Greenlee County. A number of issues must be made clear: (1) the adverse impacts to be imposed on the Morenci operations by a VRM Class I designation, (2) the adverse impacts to the Morenci operations because of the existence of a wilderness area only 330 yards away, (3) the ability of the mining company to expand its Morenci operations (including more dust from the mine) after designation of Turtle Mountain and Gila Box as wilderness areas.

97-15 It is submitted that in light of the critical nature of these economic issues, a bland statement that the economics of wilderness designation on mineral development are "not known" is unacceptable. These economic impacts must be known and must be discussed.

Arizona Mineral Zones

Figures 1, 3, 4 and 5 show the overlap of the Safford District Draft Wilderness EIS area with the State's major mineralization zones for copper (Figure 1), molybdenum (Figure 3), base and precious metals (Figure 4), and geothermal resources (Figure 5).

Copper Zone (Figure 1)

Copper is Arizona's prime mineral resource and the State's unique contribution to the world. There are currently 81 major copper occurrences identified in southern and western Arizona. Therefore, the probability for discovery of additional copper deposits is much higher in the State than in most other parts of the United States or the world. It is for this reason that the Arizona Mining Association is very concerned about the potential withdrawal of lands within this unique mineral zone. As can be seen on Figure 1 the highly mineralized copper zone overlaps the complete area of wilderness study areas in the Safford BLM District.

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[1] Map 5 at page 99 shows only the West Tailings Dam System at Morenci and does not show the Southwest Tailings Dam System located within 330 yards of the so-called San Francisco Subunit of the Gila Box WSA.

Within this Statewide copper zone, Arizona has managed to produce 45 percent of all the newly mined copper produced in the United States since the signing of the Declaration of Independence. Since the early 1960s, Arizona has consistently produced over half of the nation's annual newly mined copper and more than any other state since the 1910s. The abundance in concentration of copper in Arizona is unparalleled in any other region on earth, of comparable size.

97-16 The Arizona Mining Association requests that the area of overlap of the copper mineral zone on the Safford District Draft Wilderness EIS area be given careful consideration.

TABLE 1

PAST & PRESENT KNOWN COPPER DEPOSITS IN ARIZONA

Numerical Listing of Deposits on Figure 1

LEGEND

TYPE	
O	Open Pit
U	Underground
L	Leach
S	Strip Mine

STATUS	
O	Operating
D	Developing
MD	Major Discovery
MP	Major Project

TABLE 1 (continued)

OPERATING COPPER MINES

	NAME	TYPE	COMPANY
1.	Mineral Park (Ithica Peak)	0	Pennzoil Co. (Duval Corp.)
2.	Bagdad	0	Cyprus Mines Corp.
3.	New Cornelia (Ajo)	0	Phelps Dodge Corp.
4.	Lakeshore	U & 0	Noranda Mines Ltd.
5.	Silver Bell	0	ASARCO Inc.
6.	Sacaton	0	ASARCO Inc.
7.	Magma (Superior)	U	Newmont Mining Corp.
8.	Bluebird	0	Ranchers Exploration & Development Co.
9.	Miami	L	Cities Service Co.
0.	Pinto Valley	0	Cities Cervice Co.
1.	Oxhide	0	Inspiration Consolidated Copper Co.
2.	Inspiration Mines	0	Inspiration Consolidated Copper Co.
3.	Copper Cities	L	Cities Service Co.
4.	Ray	0	Kennecott Minerals Co.
5.	Christmas	0	Inspiration Consolidated Copper Co.
6.	Old Reliable	L	Ranchers Exploration & Development Co.
7.	San Manuel	U	Newmont Mining Corp.
8.	San Xavier	0	ASARCO Inc.
9.	Mission	0	ASARCO Inc.
20.	Pima	0	Cyprus Pima Mining Co.
1.	Palo Verde	0	Eisenhower Mining Co. (Anamax-ASARCO)
2.	Twin Buttes	0	Anamax Mining Co.
3.	Sierrita	0	Pennzoil Co. (Duval Corp.)
4.	Esperanza	0	Pennzoil Co. (Duval Corp.)
25.	Johnson	0	Cyprus Mines Corp.
6.	Morenci	0	Phelps Dodge Corp.
27.	Metcalf Mines	0	Phelps Dodge Corp.
8.	Copper Queen (Bisbee)	L	Phelps Dodge Corp.

TABLE 1 (continued)

DEVELOPING COPPER MINES

	NAME	TYPE	COMPANY
1.	Sacaton East	U	ASARCO Inc.
2.	Casa Grande	U	Casa Grande Copper Co. (Hanna-Getty)
3.	Van Dyke	L	Occidental Minerals Co.
4.	Miami East	U	Cities Service Co.
5.	Kalamazoo	U	Newmont Mining Corp.
6.	Oracle Ridge	U	Oracle Ridge Mining Partners (Continental Materials & Union Miniere)
7.	Dos Pobres	U	Phelps Dodge Corp.
8.	San Juan	0	Producers Minerals Corp.-- Cochise Mining Co.
9.	Sanchez	0	Inspiration Consolidated Copper Co.

MAJOR COPPER DISCOVERIES

	NAME	TYPE	COMPANY
1.	Copper Basin	0	Phelps Dodge Corp.
2.	Vekol	0	Newmont Mining Corp.
3.	Florence	U	Continental Oil Co.
4.	Helvetia	0	Anamax Mining Co.
5.	Rosemont	0	Anamax Mining Co.
6.	Red Mountain	U	Kerr-McGee Corp.
7.	I-10	U	Cyprus Mines Corp.
8.	Lone Star	U	Kennecott Mineral Co.
9.	Lone Star Ext.	U	Kennecott Mineral Co.

TABLE 1 (continued)

MAJOR COPPER PROSPECTS

	NAME	COMPANY
1.	Apex	U. S. Government & U. S. Metals Corp.
2.	White Mesa	Navajo Tribe
3.	Emerald Isle	El Paso Co.
4.	Antler	Standard Metals Corp.
5.	Mineral Hill	Powder Metals Corp.
6.	Bruce	Cyprus Mines Corp. (AMOCO)
7.	Zonia	McAlester Fuel Co.
8.	Jerome	Phelps Dodge Corp.
9.	Binghampton	Conoco & Superior Oil
10.	Pine Flats	Cominco
11.	Castle	Superior Oil
12.	Blue	Superior Oil
13.	Squaw Peak	Exxon Minerals
14.	Carlota	S. B. Owens
15.	Cactus	Cities Service Co.
16.	Red Hill	Cities Service Co.
17.	Old Dominion	Cities Service Co.
18.	Chilito	Kennecott Minerals Co.
19.	Santa Cruz (Sacaton West)	ASARCO & Freeport Minerals Co.
20.	Poston Butte	ASARCO Inc.
21.	Atlas	BS & K Mining Co.
22.	Copper Creek	Newmont Mining Corp.
23.	Korn Kob	Keystone Minerals Inc.
24.	Park Hill	United States Government
25.	Dynamite	V. B. Smith Estate
26.	Peach Elgin	Anamax Mining Co.
27.	Ventura	Noranda Mines Ltd.
28.	Four Metals	Noranda Mines Ltd.
29.	Towne Mines	Towne Mines & ASARCO
30.	Strong & Harris	Strong & Harris
31.	Dragoon	Crane Co.
32.	Aztec (Mame)	Aztec Mining Corp.
33.	Turquoise	Union Oil
34.	Bisbee-North	Cochise Development Co.
35.	Rattler	Carley Moore (?)

Mobile Copper Mineral Belt

It is a well known fact that within the mineral community that copper occurrences are not haphazard, but are located along well defined zones or belts. Ten years ago, Harrison Schmitt; Sr. proposed copper mineral belts that connected the Santa Rita ore body near Silver City with the Morenci ore body in eastern Arizona. Little activity was conducted along these zones until mid-1975 when Exxon Minerals Corporation discovered the Pinos Altos copper deposit north of Silver City. This discovery touched off numerous exploration projects within these mineral belts. Figure 2 shows the project concentration that has occurred along these belts and the producing and developing properties that have been discovered. At least three of these mobile mineral belts, trending approximately N 65° W traverse Graham and Greenlee counties in Arizona and extend into southwestern New Mexico.

The Safford Mineral Belt contains the large copper deposits of Phelps Dodge Corporation (Dos Pobres), Kennecott Copper Corporation (Lone Star Extension), Producers Minerals (San Juan) and Inspiration Consolidated Copper Company (Sanchez). In addition, numerous excellent exploration targets occur within this belt and are actively being prospected.

The extent of the Safford Mobile Mineral Belt in a northeast and southwest direction is not absolute. There is a distinct possibility that the mineral belt could extend northward, and in fact, coincide with the Morenci-Tyrone Mineral Belt as exploration in the Safford District continues. Since the whole region falls within the Basin and Range Physiographic Province and completely within the highly mineralized copper zone of Arizona as illustrated on Figure 1, it is entirely conceivable that the Safford Mineral Belt is wider than depicted on Figure 2. In any event, the Day Mine (4-16) WSA occurs entirely within the Safford Mineral Belt and the southern half of Fishhooks (4-14) WSA occurs within that same mineral belt. Consideration should be given to deleting those WSAs from further analysis due to the strong mineral potential within the mineral zone.

The Morenci-Tyrone Mineral Belt contains the large well known copper deposits of Morenci, Metcalf and Tyrone. Many smaller deposits also occur within this belt, including those of the Steeple Rock Mining District of New Mexico. Numerous exploration targets occur within this mineral belt and a large number of mining companies are presently examining these prospects. The Morenci-Tyrone Mineral Belt intersects the northern half of the Gila Box (4-22/23/24(A)) and the northern half of the Turtle Mountain (4-22/23/24(B)) BLM Wilderness Study Areas. These areas should be deleted from further consideration due to the strong mineral potential shown within the mineral zone. There is a high probability that continued exploration of lands surrounding Morenci, Arizona and Tyrone, New Mexico will delineate significant copper finds.

The Blue Range-Santa Rita Mineral Belt contains the well known Santa Rita deposit, or Chino Open Pit of Kennecott Copper Corporation. In addition, the recent discovery of the Pinos Altos copper deposit by Exxon Minerals Corporation occurs north of Silver City, New Mexico and well within the mineral belt. This copper discovery was based on the Mobile Mineral Belt Theory and has subsequently led Exxon Minerals and other companies to increase their exploration

(continued on page 29)

Table 2

Mobile Mineral Belt Influence on BLM Wilderness Study Areas
(Updated to January 1, 1979)

❹ Producing and Developing Properties

A. Dos Pobres Copper Orebody owned by Phelps Dodge Corporation, currently in the development stage.

B. San Juan Copper Orebody owned by Producers Minerals, currently in production.

C. Lone Star (Safford) Copper Orebody and the Lone Star Extension Copper Orebody owned by Kennecott Copper Corporation, currently in the development stage.

D. Sanchez Copper Orebody owned by Inspiration Consolidated Copper Company, currently in production and development stages.

E. Morenci Open Pit Copper Orebody owned by Phelps Dodge Corporation, producing since 1882, includes over 100 small past producing mines, cumulative production estimated at 3 billion dollars (reference 1). Third largest open pit mine in the world.

F. Metcalf Mines (Metcalf Ridge Open Pit Copper Orebody and King Ridge Open Pit Copper Orebody) owned by Phelps Dodge Corporation, producing as open pits since 1972, includes over 50 small past producing mines, cumulative production estimated as above to be over 3 billion dollars (reference 1).

G. Laura Mine, Summit Mine, and Bank Mine of the Steeple Rock District. Gold, silver, copper, lead, zinc deposits. Intermittently worked, considered excellent exploration prospects.

H. Carlisle Mine and Ontario Mine of the Steeple Rock District. Gold, silver, copper, lead, zinc deposits. Presently producing, owned by Billingsley.

I. East Camp Mine, Davenport Mine, Golden Nugget Mine, and Golden Rod Mine of the Steeple Rock District. Gold, silver, copper, Lead, zinc deposits. Intermittently worked, East Camp Mine presently in limited production. All considered excellent exploration prospects.

J. Alabama Mine, Mount Royal Mine, and Jim Crow Mine of the Steeple Rock District. Gold, silver, copper, lead, and zinc deposits. Intermittently worked, considered excellent exploration prospects. The 12 mines of the Steeple Rock Mining District (G through J) produced over 10 million dollars of cumulative production (reference 1).

(Table 2 continued)

K. Tyrone Open Pit Copper Orebody owned by Phelps Dodge Corporation, currently in production. Includes over 30 small past producing mines, cumulative production estimated at 80 to 100 million dollars (reference 1).

L. Pinos Altos Copper Orebody owned by Exxon Minerals Corporation, currently in development stage. Past production includes over 30 small mines and over 70 million dollars of cumulative production.

M. Bayard Mines, owner unknown, includes 10 past producing mines. Presently in production. Silver, zinc, lead, copper, iron. Cumulative production is estimated at 10 million dollars (reference 1, et al).

N. Continental Orebody, owned by UV Industries, includes 10 past producing mines. Presently in production. Zinc, iron, lead, copper, silver, gold. Cumulative production is estimated at 40 million dollars.

O. Santa Rita (Chino) Open Pit Copper Orebody owned by Kennecott Copper Corporation, includes over 40 small past producing mines, currently in production, cumulative production estimated at 1 to 2 billion dollars (reference 1).

P. Willis Silica Quarry, owned by O. B. Willis. Currently in production, extracts high grade silica flux for the copper smelter at the Phelps Dodge Corporation, Morenci Branch. In steady production since 1957.

Q. Silver-Gold leaching operation, currently in production. Commenced operations in late-1978. Small mining company.

(Table 2 continued)

Mobile Mineral Belt Influence on RARE II Wilderness Recommendations
(Updated to January 1, 1979, plus new prospects)

⓫ Exploration Prospects

1. Boggs Ranch: Currently an exploration target of Superior Oil Company-Minerals Division and Brigham Young University Development. Potential is considered strong and numerous drill holes will be completed on this target in search for a copper orebody similar to the presently known orebodies of the Safford Mineral Belt.

2. Oliver Mine: Manganese, in Carboniferous limestone (reference 2).

3. Black Rock (Black Magic) Mine: Manganese, in Ordovician Longfellow-limestone (reference 2).

4. Twin Peaks Mine: owned by Frazer-Martin Mines, Ltd. and currently under option by Superior Oil Company-Minerals Division. Cumulative past production estimated at 2 million dollars. Considered a primary copper, gold, silver, lead, zinc, flourspar exploration target within the Morenci-Tyrone Mineral Belt.

5. Twin Peaks South: Staked by Superior Oil Company-Minerals Division and currently being explored. Contains the past producing Norman King Mine which yielded rich amounts of silver, lead, zinc, and copper. Considered an excellent exploration target in the Morenci-Tyrone Mineral Belt.

6. Blue Range-Strayhorse Exploration Target: Exploration program carried out by Phelps Dodge Corporation in 1972 through 1974. Excellent drilling target, copper discovered during drilling, Forest Service delays and interventions caused termination of project. Proved that there is copper potential in the Blue Range-Santa Rita Mineral Belt (reference 3).

7. Blue Range-Toronado Exploration Target: Exploration program carried out by Phelps Dodge Corporation in 1969 and 1970. Data derived from the drilling program stepped up exploration in the Blue Range Primitive Area. Forest Service mandatory delays caused eventual termination of project. Indicated excellent copper mineral potential in the Blue Range-Santa Rita Mineral Belt (reference 3).

8. Superior Oil Company-Minerals Division Exploration Target in 1978: Presently exploring the area. Shows the potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt. The target could have encouraging results.

(Table 2 continued)

9. Blue Range-Hobo Exploration Target: Exploration program carried out by Phelps Dodge Corporation in 1969. Data derived from the drilling program stepped up exploration in the Blue Range Primitive Area. No Forest Service forced delays. Indicated excellent copper mineral potential in the Blue Range-Santa Rita Mineral Belt (reference 3).

10. Conoco Minerals Company Exploration Target in 1977 and 1978: Presently exploring the area. Shows the potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt.

11. AMAX Minerals Company Exploration Target in 1975 and 1976: Indicates the potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt.

12. Ed Stacy Claims: Have been optioned by numerous large exploration corporations including Conoco, AMAX, and Superior Oil Company. Chevron has also shown an interest. Indicates that potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt remains high.

13. Gloria Claims staked by Travis L. Gant and Associates in the Maple Peak Area during August, 1978: Currently planning exploration of the Blue Range. Indicates that mineral exploration companies feel that the potential for mineral exploration and discovery remains high in the Blue Range-Santa Rita Mineral Belt.

14. Mogollon Mines: Currently being investigated by numerous exploration companies. Minerals mined include copper, gold, silver, lead, flourspar, and uranium. Cumulative production estimated at 30 to 40 million dollars (reference 1). Current exploration centers on copper and molybdenum. This area exists at the fringe of the Blue Range-Santa Rita Mineral Belt and may actually expand this mineral belt if exploration is allowed to proceed into the surrounding areas.

15. TE Claims staked by Phelps Dodge Corporation in mid-1978: Shows the continued exploration interest in areas along the Blue Range-Santa Rita Mineral Belt. Exploration is currently underway.

16. Exxon Minerals Company is currently conducting active exploration mineral reconnaissance in the Cliff, New Mexico area for copper and molybdenum. Their exploration approach and theories are based on the completed evaluation of their Pinos Altos Copper Orebody discovery in 1977 and on the projection of the mineral trend from the Santa Rita and Pinos Altos area toward and into the Blue Range (Blue Range-Santa Rita Mineral Belt). They are also actively evaluating the Blue Range at present, although no claims have been staked to date.

17. Day Mine Prospect being conducted by Towne Mines, Inc.: Included claim staking and exploration drilling in 1974. This indicates the potential for mineral exploration in the Safford Mineral Belt.

18. Markum Wash Project carried out by Phelps Dodge Corporation in 1975: Including claim staking, geologic mapping, exploration drilling, and geophysical surveys. The prospect indicates the continued exploration for mineral deposits in the Safford Mineral Belt.

19. SOL Prospect Exploration Target: A joint venture mineral exploration program carried out by AMAX, Inc., and Phelps Dodge Corporation in 1972 through 1974. In 1975 AMAX continued the exploration program by joint venturing the target with Quintana Minerals. The claims are currently controlled by AMAX, Inc. This prospect indicates the continued search for mineral deposits above the Safford Mineral Belt.

20. Slick Rock Exploration Target staked by Phelps Dodge Corporation in 1974: Exploration drilling, geologic mapping, and geophysics conducted on the prospect. Indicates the continued exploration for mineral deposits along the Safford Mineral Belt.

21. George Stacy Claims: Optioned and exploratory drilled for mineral potential in 1969 by National Lead Corporation with favorable results. Indicates the continued exploration for mineral deposits along the Blue Range-Santa Rita Mineral Belt.

22. Humble Oil-Minerals Division Exploration Target in 1967: Conducted exploration drilling, geologic mapping, geochemistry, and geophysics of the prospect. Shows the potential for mineral exploration at the southern fringe of the Blue Range-Santa Rita Mineral Belt and may actually expand this mineral belt if exploration is allowed to proceed into the surrounding areas.

23. ASARCO, Inc. Exploration Target in mid-1950's: Lead, zinc, flourspar, molybdenum prospect. Drilling exploration program conducted. Numerous old mine workings also present. Past production evident.

24. Phelps Dodge Corporation Gila Claims: Exploration currently in progress with drilling program conducted in November, 1979. Molybdenum-flourspar prospect. Additional exploration work planned. Mineralization projected on surface into the Gila Wilderness.

25. Black Hawk District: Numerous silver-cobalt prospects, previous production. Current active development work by a small Canadian (?) firm.

26. Cobalt-molybdenum mineralization: Exploration drilling conducted on this prospect in 1971-72 by Cities Service.

27. Porphyry copper-molybdenum mineralization: Drilled in 1972-73 by Exxon Minerals.

28. Porphyry copper-molybdenum prospect: Drilled by Phelps Dodge Corporation in 1972-73.

29. White Signal Uranium prospect: Past production by small mining companies during the 1950's.

30. Kennecott Copper Company prospect: Copper tactites drilled in the 1950's.

31. The Virginia and Pyramid Mines: Copper, gold, silver, lead, zinc. Phelps Dodge Corporation and AMAX, Inc. have conducted exploration drilling projects at this location.

32. Molybdenum prospect: Drilled by AMAX, Inc. in 1979. Additional exploration drilling planned in 1980.

33. Alma prospect: Silver-gold mineralization, mined in the 1880's. Numerous exploration companies currently conducting reconnaissance in the area.

34. White Water Draw prospect: Silver mineralization, mined in the 1880's. Exploration companies currently conducting reconnaissance in the area. Mineralization and host rock similar to Mogollon District to north.

35. Lone Pine prospect: Gold-tellurium mineralization, mined in 1913. Phelps Dodge Corporation is currently conducting exploration drilling in the area. Mineralization-alteration continues into the Gila Wilderness.

36. Black Cat prospect: Manganese mineralization. North-South veins in volcanic rocks.

37. Humble Oil Uranium Prospect: Drilled in 1972-73.

38. San Simon Creek zeolites.

efforts along the belt into Greenlee County, Arizona. An abundance of mineral exploration targets have been delineated and active exploration for potential mineral prospects continues at a substantial pace along the Blue Range-Santa Rita Mineral Belt. Phelps Dodge Corporation conducted a sustained exploration program within the Blue Range Primitive Area for six years before they terminated their program due to Forest Service administrative delays, resulting inordinate costs and a copper industry depression which continues today. The program culminated with the discovery of copper mineralization approximately 2,000 feet below post-mineral volcanics, adding strength to the theory that the mineral belt is a reality and that copper ore bodies may lie beneath volcanic cover.

The mineral potential of lands lying within these three zones has never been evaluated thoroughly and as shown by the intensity of exploration activities and discoveries, it appears to be significant.

Molybdenum Zone (Figure 3)

Arizona ranks second in the United States in the production of molybdenum, behind Colorado. More importantly, over the last half century, Arizona has been the world's third largest producer of molybdenum, behind Colorado and British Columbia, Canada. With resources of some 940,000 short tons of molybdenum, Arizona's porphyry copper deposits account for about 20 percent of the total U.S. molybdenum resources. Alexander Sutulov has indicated that the demand for molybdenum is projected to double by the 1990s and triple or quadruple by the end of the century.

Figure 3 shows the location of known past and present molybdenum production in Arizona and the spacial association

of this mineral zone with the Safford District EIS area. As can be seen from the figure, there exists a distinct mineral zone from the northwestern portion of the state to the southeastern portion. It extends into Sonora, Mexico and includes the mines of Cananea and La Caridad. Note that the molybdenum zone incorporates a considerable portion of the EIS area indicating that the potential exists for additional discoveries of molybdenum within this area.

Base and Precious Metals (Figure 4)

Arizona ranks second in the nation in the annual production of silver and fourth in the annual production of gold. The major economic development and cultural growth which has occurred in Arizona since the Gadsden Purchase of 1853 and since it became a territory in 1863 can be directly attributed largely to the natural wealth of mineral resources, expecially gold and silver, that abound in the State. It was the discovery of placer gold deposits, beginning in 1857, along the lower Colorado River, that attracted prospectors to the Arizona region in large numbers. It started with the Gila City placers about 20 miles east of Yuma and a series of rich gold placers that were located north of Yuma between 1861 and 1864. About the same time, gold placers were discovered on Lynx Creek and at Weaver and Rich Hill in Yavapai County. Mining operations also began in 1863 at the rich gold deposit of the Vulture Mine which started the town of Wickenburg.

Due to the meteoric rise in the price of gold and silver since 1978, a number of gold and silver mines have reopened in Arizona. Most notable gold deposit is the Congress Mine operated by Congress Consolidated Gold Mines in Yavapai County. Additional small past-producing gold mines are expected to reopen as a more favorable economic climate develops. The mineral community is excited by the recent information that Ranchers Exploration and Development Corporation may have discovered a large low-grade gold deposit 15 miles northwest of Phoenix. As a result, exploration activity is expected to increase in the State for this type of gold deposit.

A number of silver mines also have reopened in Arizona since 1978 and many other mines with significant past production are being re-evaluated. Recent reopened mines include Gunslinger, McCracken, Silver Cross, Contention, Blue Top, State of Maine and Ash Peak (located within the Safford District EIS area).

Figure 4 shows the occurrence of base and precious metal (gold, silver, copper, lead, zinc) production in Arizona. As can be ascertained from the figure, there is a specific mineral belt in which these deposits occur and the belt is very similar to the copper mineral zone shown on Figure 1, except for the additional occurrences of base and precious metals in Yuma County. It is significant that almost all of the Safford District WSAs fall within this base and precious metal zone of Arizona.

Geothermal Resources (Figure 5)

Over 700 springs have been identified in Arizona with temperatures greater than 30° C. Figure 5, "Proven and Potential Low Temperature (less than 90° C) Geothermal Resources" indicates that there is a zone of low temperature geothermal gradient, in southern Arizona. This zone encompasses all but two (Needle's Eye 4-1A and Fishhooks 4-14) of the WSAs of the Safford District EIS area.

Arizona Mining Association Comments on Individual Areas

97-17 Due to the information presented in this report, the Arizona Mining Association finds that the Proposed Action with exceptions is an acceptable alternative. We believe that the EIS should be redrafted to more fully reflect the mineral potential and U.S. Mineral Policies currently in effect as well as other items pointed out herein. We feel that the Proposed Action with exceptions, would require minimal acquisition of private surface or mineral interests, thereby allowing development which would benefit both the State and the Nation.

What follows are detailed comments of each of the nine BLM Wilderness Study Areas.

Needle's Eye (4-1A)

The Bureau of Land Management Wilderness Study Area (WSA) 4-1A, located in Gila County, is a triangular-shaped area of 9,485 acres bounded to the north and southeast by the San Carlos Indian Reservation. The unit (known as the Needle's Eye WSA) occupies the northwestern bank of the Gila River below Coolidge Dam and is in the eastern end of the Mescal Mountains. The Gila River and it's major tributaries have cut rather steep canyons through the Mescal Mountains, with elevations ranging from around 2400 to 4500 feet above sea level.

General Geology

The geology of the Needle's Eye Wilderness Study and surrounding areas has been described by Willden (1964) and Eastlick (1968), among others, from whom the following discussion of the geology was derived. The Mescal Mountains are composed of rocks which range in age from older Precambrian to Quaternary. The older Precambrian basement within the Wilderness Study Area consists of granite, upon which the younger Precambrian Apache group and Troy quartzite were unconformably deposited. These units were presumably intruded during the Precambrian by diabase and diorite sills. The Paleozoic section in the Needle's Eye Area is represented by (from oldest to youngest): undivided Cambrian quartzites, conglomerates, and Devonian Martin Limestone Formation, Mississippian Escabrosa Limestone, and Pennsylvanian-Permian Naco Limestone. Within the study area, these units are disconformably overlain by Tertiary volcanics and interbedded basalts and conglomerates of the Tertiary-Quaternary Gila Conglomerate. Immediately to the south of the wilderness study area, however, Cretaceous sediments and volcanics occur between the Naco Limestone and Tertiary volcanics. Cretaceous-Tertiary diorite, quartz monzonite and andesite dikes and sills also are found south of the wilderness study area, cutting the older rocks.

Within the Needle's Eye, the sediments and underlying granite are tilted to the southwest 20-30 degrees with three major northwesterly-trending faults traversing the area. Each of the faults are normal faults dropping the northeast side down in relation to the southwest. The faults are (from the southwest to northwest): Bull Basin fault, Mescal Creek fault, and Dick's Spring fault (Willden, 1964).

Mineral Resource Potential

Although mineral production has never occurred within the Needle's Eye Wilderness Study Area, prospects of various commodities exist

adjacent to the wilderness study area. These include base and precious metals (primarily copper), uranium, coal, asbestos, and zeolites, most of which occur in formations similar to those in the wilderness study area.

Base and Precious Metals

The Christmas Mine, owned and operated by the Inspiration Copper Company, is located in the Banner mining district, approximately five miles southwest of the Needle's Eye unit (Figures 6&7). The Christmas Mine is currently producing copper, gold, and silver from replacement bodies and fissure veins in the Paleozoic sediments, notably the Naco, Escabrasa, and Martin Formations (Peterson and Swanson, 1956; Eastlick, 1968). Ore bodies in the Christmas Mine are associated with Cretaceous to early Tertiary quartz diorite dikes and sills (Eastlick, 1968). Other deposits in the Banner and nearby Saddle Mountain (Figure 7) mining districts are similar to the Christmas Mine, although the deposits occur in rocks ranging from the Precambrian Mescal Formation to the Cretaceous volcanics. In addition to copper, gold, and silver, lead and zinc also were produced in these mines (Kiersh, 1951; Wilson, 1951, page 9; Willden, 1964; Eastlick, 1968).

Little or no secondary enrichment occurred at the mines in the Banner district, only localized in situ oxidation of the primary ore bodies (Eastlick, 1968). Due to the lack of a widespread leached capping zone and the localization of the ore bodies at or near the contacts of Laramide intrusives, it is entirely likely that Christmas-type ore bodies could occur at depth in the wilderness study area with little or no surface indication. Due to the high magnetite and sulfide content of the ore bodies, however, magnetic and/or electrical geophysical techniques should detect these ore bodies, if present. It is unknown whether or not geophysical surveys have been run over the Needle's Eye Wilderness Study Area as surveys are typically proprietary information. Thus the potential for ore bodies similar to those in the nearby Banner mining district is unknown, although it should be considered.

In addition to the major copper deposits in the Banner mining district, a small copper-gold-silver prospect is located 1.5 miles north of the Wilderness Study Area (Figure 7). The Copper King (or Wylomene) prospect consists of small shears and stringers cutting Precambrian diabase and the Troy Quartzite (Bromfield and Shride, 1956). Although the Copper King prospect has not proven to be economic, it shows that copper mineralization in the area is not limited to the Banner and Saddle Mountain districts.

Gold placer deposits in Gila Conglomerate have been worked to a small extent, accounting for approximately $15,000 of production between 1907 and 1949 (Wilson, 1961). As Gila Conglomerate occurs within the wilderness study area, potential for gold placers may exist, although an apparent lack of gold-bearing source rocks would indicate that this potential is low.

Coal

The Deer Creek coal field, located apporoximately six miles southeast of the Needle's Eye Wilderness Study Area (Figure 7) is composed of thin coal seams interbedded in Cretaceous sediments (Willden, 1964). Although the coal field has been limited production in the past, it is unlikely that it will yield coal in the future due to the thinness and high ash content of the seams and to the relative inaccessibility of the coal field (Pierce, et al, 1970). Willden (1964, Pl. 1) shows a small outcrop of Cretaceous volcanics lying on Pennsylvanian Naco Limestone, located on the northwest boundary of the wilderness study area. This indicates that the coal-bearing sediments in the wilderness study area were either never deposited or were eroded prior to Cretaceous volcanic activity. In either case, the coal-bearing rocks are not present within the wilderness study area, therefore there is no potential for coal.

Uranium

Uranium mineralization is found in the upper member of the Precambrian Dripping Spring Quartzite, part of the Apache Group. Over 100 deposits, 19 of which have produced ore, are known to occur within the formation, most of which are in Gila County (Granger and Raup, 1969). Uranium is usually found as vein-type deposits associated with Precambrian diabase sills and dikes, although some deposits are concordant with bedding (Pierce, et al, 1970). Prospecting activity in and near the western end of the Needle's Eye Wilderness Study Area is evidenced by the numerous unpatented claims located by Phillips Uranium Company (Figure 8). The Dripping Spring Quartzite with diabase sills is present throughout most of the wilderness study area (Figure 8). The potential for uranium mineralization should thus be rated at least moderate due to the occurrence of favorable beds and prospecting activity.

Industrial Minerals

Asbestos (crysotile) occurs as several small prospects in the Hayes Mountains five to six miles north of the wilderness study area. The asbestos deposits are within concordant

serpentized limestone bodies associated with diabase intrusives in the Precambrian Mescal Formation of the Apache Group (Bromfield and Shride, 1956). Limited amounts have been produced from one of the prospects. Although the Mescal Formation is present within the study area, no asbestos mineralization has been observed (Willden, 1964).

A zeolite deposit occurs approximately eight miles west of the Needle's Eye Wilderness Study Area (Figure 7), where a one to two foot thick vitric tuff bed interbedded with Gila Conglomerate has been partially altered to chabazite (Eyde, 1978). Anaconda has investigated the deposit, locating claims as near as four miles west of the area. The potential of similar deposits occurring within the area is thought to be low as volcanic rocks interbedded with Gila Conglomerate consist primarily of basalt flows (Willden, 1964) rather than the more acidic water-lain tuffs required for zeolite formation (Eyde, 1978). In addition, the mountainous terrain and inaccessibility of the wilderness study area would inhibit economic production if zeolites did occur.

Geothermal Resources

The Mescal Warm Spring occurs along the Mescal Creek fault discharging from the Pennsylvanian Naco Limestone (Figure 7). The spring is associated with a large tufa (calcium carbonate) mound (Willden, 1964), indicating that the waters are experiencing a rise in temperature as they emanate from the springs. An observed temperature of around 29° C was measured by Swanburg, et al (1977) although Willden (1964, page E5) reported that the spring "was considerably below atmospheric temperature." A calculated geothermal temperature based on silica content of the spring water indicates that the reservoir temperature is around 69° C (Swanberg, et al, 1977). These temperatures are within normal values of subsurface waters of the Basin and Range Province (Swanburg, et al, 1977), and are too low a temperature for economic development. The geothermal resource potential of the Needle's Eye Wilderness Study Area should be considered low to nil.

Conclusions

The mineral resources of the area surrounding the Needle's Eye Wilderness Study Area is dominated by the Christmas Mine, five miles to the southwest, with various other commodities occurring within a close proximity of the wilderness study area (Figures 7&8). The potential for economic concentrations of Christmas-type base and precious metal deposits is unknown, but speculatively could be moderate. Potential for uranium deposits

in the Precambrian Dripping Spring Quartzite should be rated as low to moderate, while the potential of the other commodities should be rated as low to nil.

The Arizona Mining Association therefore agrees with the Proposed Action, except that we recommend that the west one-third of the unit be deleted from further consideration due to its proximity to the large Inspiration Consolidated Copper Company's Christmas porphyry copper deposit. In addition, there is significant potential for uranium mineralization within the western portion of the Needle's Eye unit.

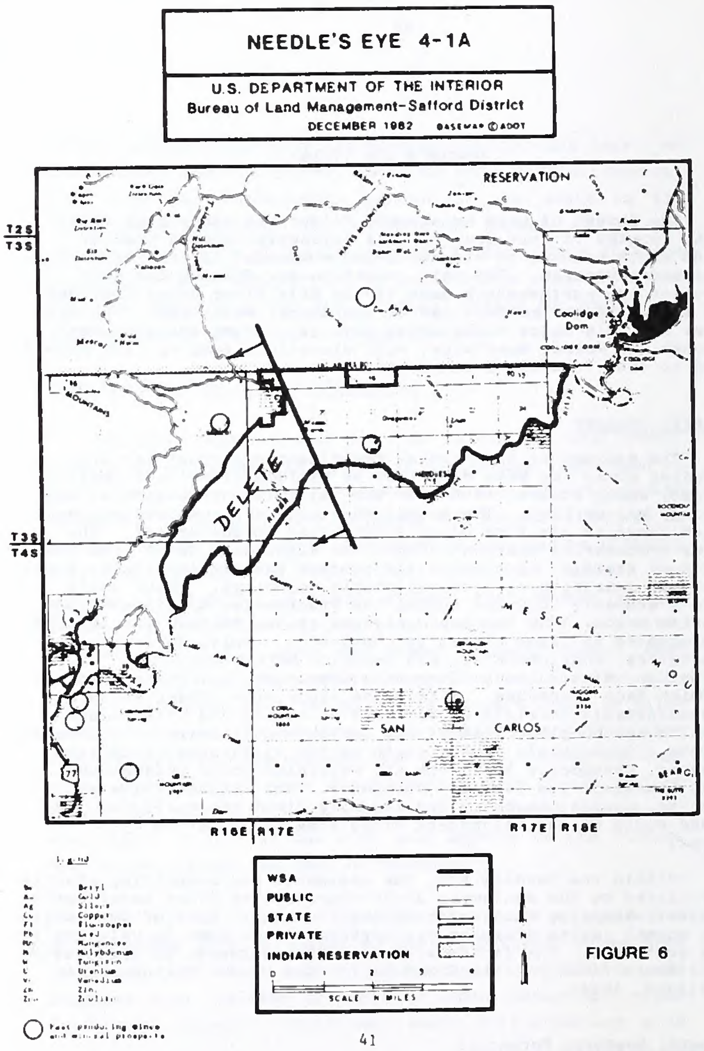
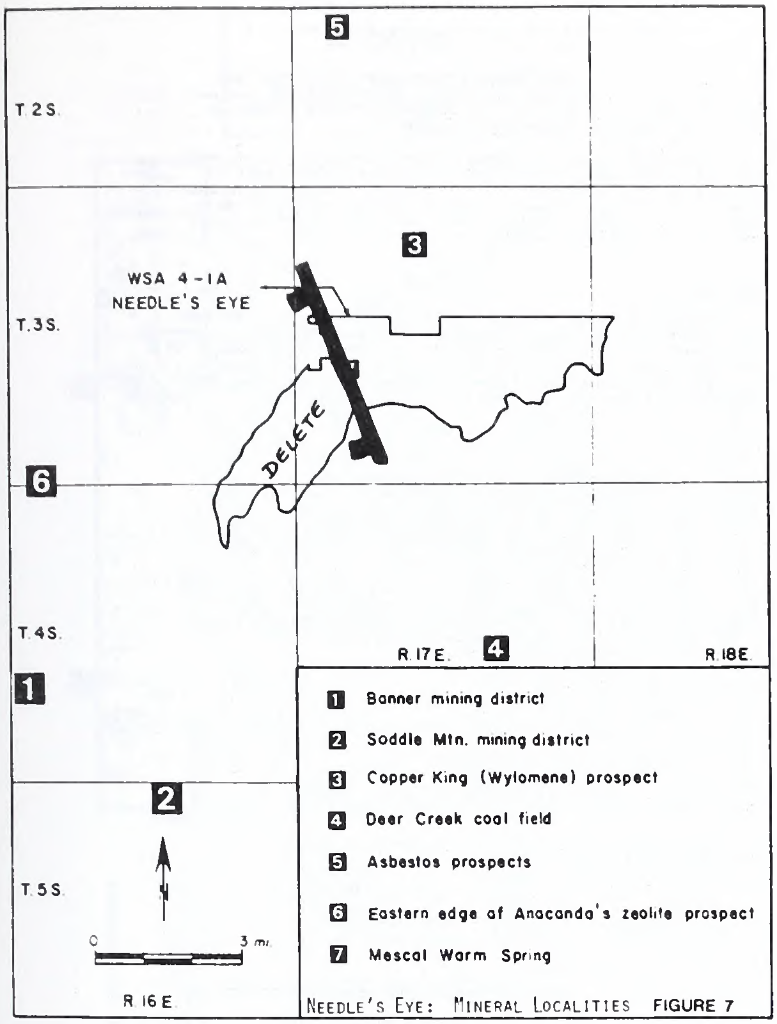
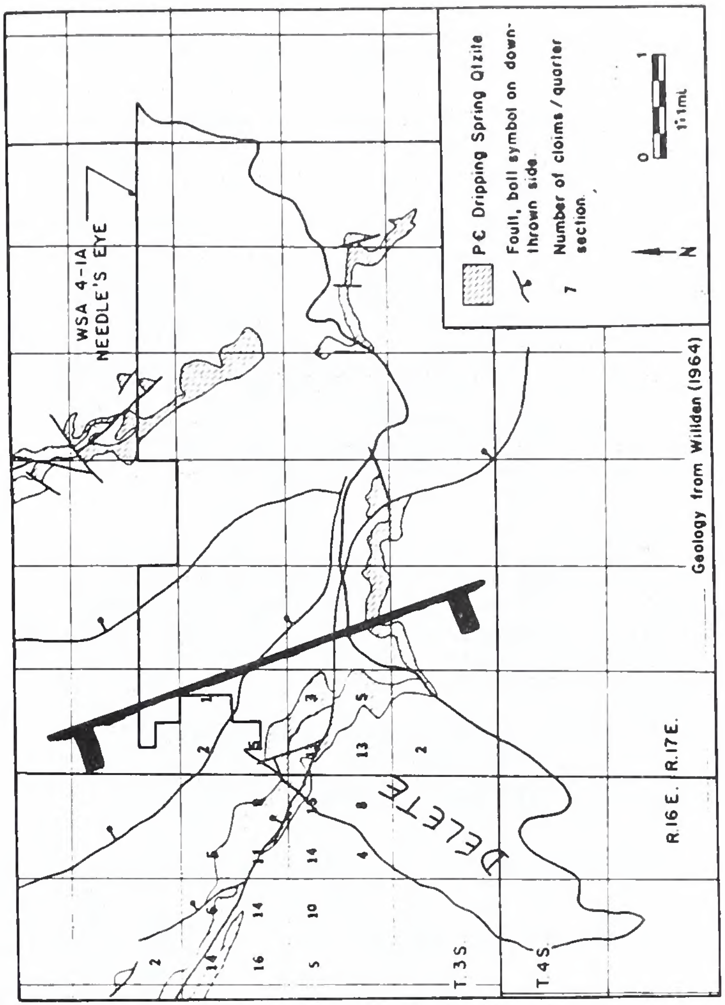


FIGURE 6



NEEDLE'S EYE: MINERAL LOCALITIES FIGURE 7


WSA 4-1A
NEEDLE'S EYE
DELETE
P€ Dripping Spring Qtzite
Fault, ball symbol on downthrown side.
Number of claims / quarter section.
0
1
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N
Geology from Willden (1964)
R.16E. R.17E.
T.3S.
T.4S.

Needle's Eye WSA: Important Geologic Structures and Unpatented Mining Claims FIGURE 8

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Black Rock 4-8

The Black Rock Wilderness Study Area AZ 4-8 in the Santa Teresa Mountains is in southeastern Arizona in the western part of Graham County. The comments presented here address the mineral potential of the area based on geological exploration by member companies of the Arizona Mining Association.

Geographic Setting

The 8,492 acre Black Rock Wilderness Study Area lies south of the San Carlos Indian Reservation and encompasses Jackson Mountain on the east and Black Rock on the west. Elevations within Black Rock range from 3550 to 5900 in rugged mountainous terrain. The imprint of man's work in the form of mining activities is substantially noticeable in parts of the wilderness study area.

Geology

The geology within the Black Rock Wilderness Study Area consists of Precambrian metamorphic rocks and Laramide metavolcanics intruded by Laramide quartz monzonite to granodiorite intrusives and overlain by mid-Tertiary volcanics and Gila conglomerate. Laramide intrusives form a large batholith in the wilderness study area and dip beneath a cover of mid-Tertiary rhyolitic volcanics. Basin and Range faulting trends northwest, uplifting the Santa Teresa Range (Ross, 1925).

Mineral Resource Potential

Fluorspar and copper mines and prospects occur within the Black Rock Wilderness Study Area. Commercially economic fluorspar deposits occur in fissure veins in the eastern part of the wilderness study area. Disseminated copper mineralization occurs in a large area in the western parts of the Wilderness Study Area (Figure 9) and continues westward. Mining claims in the Wilderness Study Area are shown on Figure 10.

The Aravaipa-Stanley Mining District located five miles west and southwest of the Wilderness Study Area has produced over 275,000 tons of ore which averaged 5.0% Zn, 1.8 ounces per ton silver and 0.33% copper in skarn and replacement deposits (Reiter, 1980). The mineralization in the Aravaipa-Stanley Mining District occurs along the western edge of the Laramide intrusive batholith. The Black Rock Wilderness Study Area occurs along the eastern edge of the Laramide batholith and similar mineralization in the Aravaipa-Stanley District and possible large-tonnage porphyry copper deposits may occur beneath younger volcanic cover and Laramide andesites underneath the Black Rock Wilderness Study Area (AMA, 1960; AMA, 1963; AMA, 1960).

A discussion of the mines and prospects adjacent to or within the Wilderness Study Area follows:

Rhodes Spar - Mt. Jackson Mine

The Rhodes Spar Mine or Mt. Jackson Mine is located adjacent to and within the Wilderness Study Area in T 6 S, R 22 E in Sections 5, 6 and 7. The main fluorite vein has an exposed strike length of 700' and a vertical exposure of 120'. The fluorite vein varies in thickness from 1-8'. The vein occurs in foliated granitic gneiss. The fluorite vein strikes N 35° W and dips at 85° to the northeast. Over 30,000 tons of fluorspar have been delineated.

Approximately 1,200 tons of fluorspar has been shipped from the Rhodes Spar or Mt. Jackson Mine (Elevatorski, 1971).

Fluorspar is a strategic mineral on the National Defense stockpile list. The wilderness classification of the Black Rock Wilderness Study Area would hamper future development of the Rhodes Spar or Mt. Jackson Mine (Steward, 1981).

Fischer Prospect

Copper mineralization occurs in the Santa Teresa granite, andesite and quartz monzonite within the western edge of the Wilderness Study Area. Areas of copper mineralization consists of northwesterly trending fractures mineralized with chalcopyrite, cuprite, chalcocite, covellite, and chryscolla. Numerous prospect pits are located in T 6 S, R 21 E in Sections 4-9. The veins are generally 6" to 1' and contain copper carbonates, calcite and manganese oxidizes. Areas of copper mineralization referred to as the Fischer Prospect are as follows:

2A) Copper pits with mineralization located along the flanks of Fischer Canyon that occurs in a 2,200' by 300' mineralized zone.

2B) Copper mineralization located near Fischer Springs with a small open cut in a 900' by 300' mineralized zone.

2C) Copper mineralization located 4,400' southwest of Fischer Spring near Black Canyon Wash consists of weak pyrite and hematite mineralization in a 1400' by 600' mineralized zone.

Alteration in the Granite consists of epidote and chlorite along narrow but persistent zones possibly indicative of the outer portions of a porphyry copper deposit (AMA, 1960; Miller and Arnold, 1958).

Figure 11 shows the relationship between the Black Rock BLM WSA (4-8), the Forest Service's Santa Teresa RARE II Wilderness Proposal area, and the past or present producing mines or prospects as well as the highly significant Santa Teresa Mineral Zone which traverses almost the entire Black Rock wilderness study area.

Oil and Gas

Exploration for oil and gas in southeastern Arizona has been stimulated by "Overthrust Belt" oil and gas discoveries in Wyoming and Utah (Keith, 1979). Oil and gas leases in the Black Rock Wilderness Study Area are shown in Figure 12. A wilderness classification would impair discoveries of any possible oil and gas that may exist.

Conclusion

The Black Rock Wilderness Study Area (AZ 4-8) has a potential for mineral resources including porphyry copper-molybdenum deposits, precious metal bearing skarn deposits, and fluorite deposits. Oil and gas leases also occur in the wilderness study area. It also occurs within the significant Santa Teresa Mineral Zone.

The Arizona Mining Association strongly recommends that the Black Rock Wilderness Study Area (AZ 4-8) be dropped from the wilderness inventory and reassume a multiple use classification open to resource development under the guidelines of existing statutes.

Table 3 (reference Figure 9)
MINERAL OCCURRENCES/PROSPECTS (WSA 4-8)

1) Prospects (Section 1 T 6 S, R 21 E)

2) Fischer Prospect Cu, Pb, Au, Ag
(Sections 5-9, T 6 S, R 21 E)

- A) Sections 8 and 9, T 6 S, R 21 E
- B) Sections 6 and 7, T 6 S, R 21 E
- C) Sections 5 and 8, T 6 S, R 21 E

3) Mt. Jackson Fluorite

Fluorite - Patented Ground

4) Black Rock

Carpenter Cave (Section 33, 34, T 5 S, R 21 E)

5)	Mt. Jackson	1-6	Rhodes, J. C., C. R.
6)	Partners	1-13	Rhodes, C.R., Willis, S.
7)	Raven	1-7	Laughery, C, Penny, O. L.

BLACK ROCK 4-8

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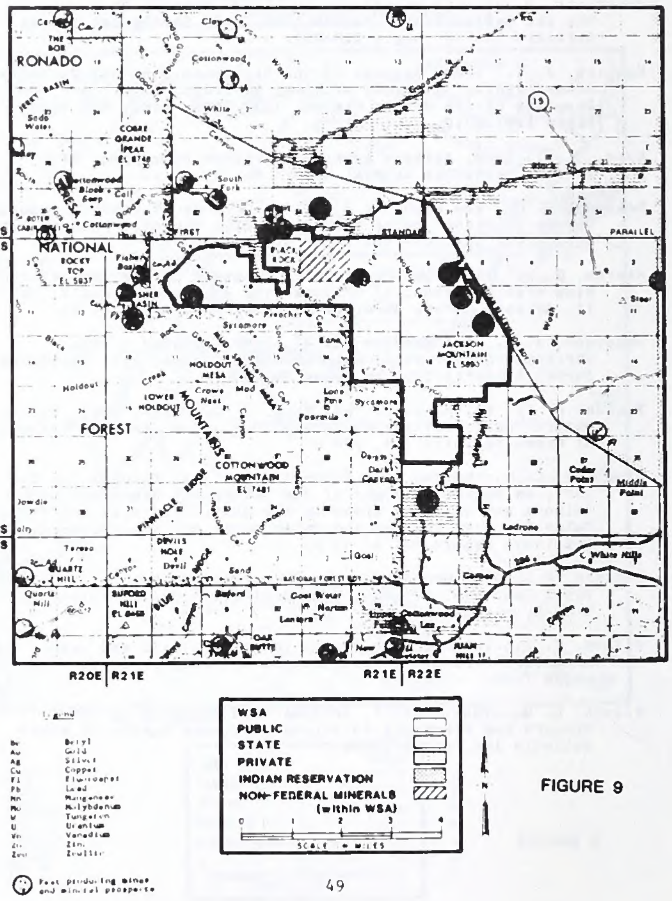

FIGURE 9

BLACK ROCK 4-8

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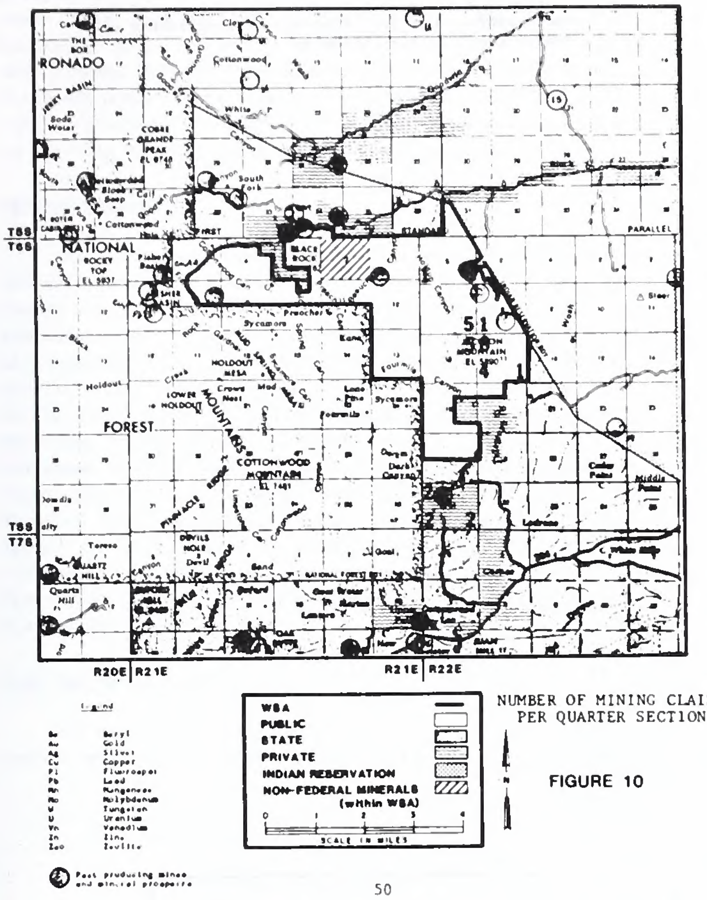

NUMBER OF MINING CLAIMS PER QUARTER SECTION

FIGURE 10

BLACK ROCK 4-8

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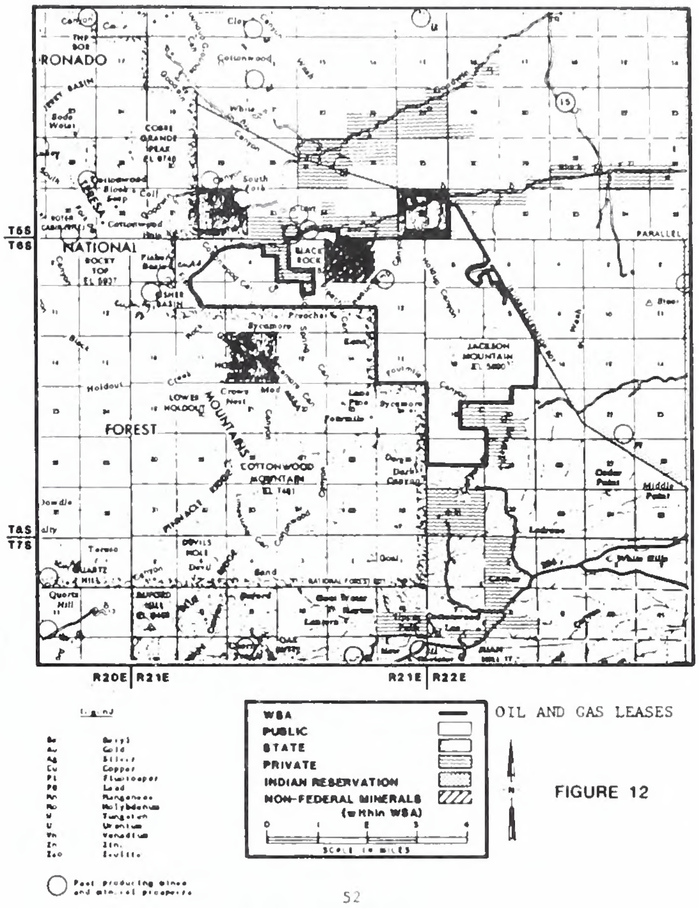

OIL AND GAS LEASES

FIGURE 12

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Fishhooks 4-14 and Day Mine 4-16

The Fishhooks and Day Mine Wilderness Study Areas are located northeast of Fort Thomas in the Gila Mountains, adjacent to the southern boundary of the San Carlos Indian Reservation. The study areas occupy parts of Townships 2-4 South, Ranges 23 East and 24 East and lie in the Mexican Highlands region of the Basin and Range physiographic province.

General Geology

Outcrops of Cambrian quartzite and Mississippian limestone occur to the southwest of the wilderness study area and these units probably extend under the wilderness study area. Tertiary volcanic rocks include primarily basalts and andesites and are present overlying tbe Paleozoic sediments. Several Tertiary intrusive rocks cross-cut the volcanic rocks near the western end of the study area.

Mineral Resource Potential

Porphyry Copper

Numerous copper showings and old workings occur in the mineral belt starting northeast of Safford in the Lonestar Mining District and continuing to the northwest through the wilderness study area, for a total distance of at least 40 miles. The Lonestar Mining District, at the southeastern extent of this trend of prospects, contains nearly two billion tons of known porphyry copper mineralization. The host rocks of this mineralization, in addition to outcroppings of the productive porphyry intrusive, continue to the northeast thru the study areas and have a significant potential for additional copper mineralization.

The Southerland Copper Company encountered copper sulfides in a vein southeast of the wilderness study area. An additional copper prospect six miles north of Geronimo has produced one car load of material averaging less than 1% copper from a fault vein in the Mississippian limestone. These prospects show that copper mineralization exists in a continuous belt parallel to the Gila Mountains and extends through the wilderness study area.

Figures 13 and 14 show the past producing mines or prospects and the number of unpatented mining claims in each section of the Fishhooks WSA and the Day Mine WSA, respectively.

Oil Leases

The wilderness study area may have potential for oil and gas production. This overthrust belt responsible for the occurrence of large oil fields in Wyoming, Utah, and in Chihuahua, Mexico, is thought to continue through Arizona and includes the wilderness study area. This possibility has recently generated a great deal of exploratory geophysical and drilling activity primarily by Phillips Petroleum Company and Anschutz Corporation. Current interest in the Wilderness study area is shown by the large number of oil and gas leases held in the area.

Conclusion: Fishhooks 4-14

There is a large number of unpatented mining claims and exploration interest in the southern portion of the Fishhooks WSA. The mineral data available does not support deletion of the complete area from further consideration as wilderness. Therefore, the Arizona Mining Association agrees with the conclusion of the Safford District BLM that the Proposed Action, which would delete the lower one-third of the unit from further consideration while still retaining the upper two-thirds of the unit in the wilderness evaluation system, is appropriate.

Conclusion: Day Mine 4-16

Due to the large number of unpatented mining claims, the proximity of the Southland Copper Company prospect on southeast periphery and the recent significant exploration activity within the Day Mine WSA (near the Day Mine in the northwest portion of the WSA) by ASARCO (not presented herein, but available data in the BLM Safford District files), the Arizona Mining Association strongly agrees with the decision of the Safford BLM to delete the Day Mine WSA from further consideration.

This area shows potential for porphyry copper mineralization. The possibilities for porphyry copper mineralization and the interested oil and gas potential should justify assigning the area to a multiple use classification.

REFERENCES

Keith, S.B., 1979, the Great Southwestern Arizona Overthrust Oil and Gas Play; Arizona Bureau of Geology and Mineral Technology Fieldnotes, Volume 9, No. 1, page 10-14.

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FISHHOOKS 4-14

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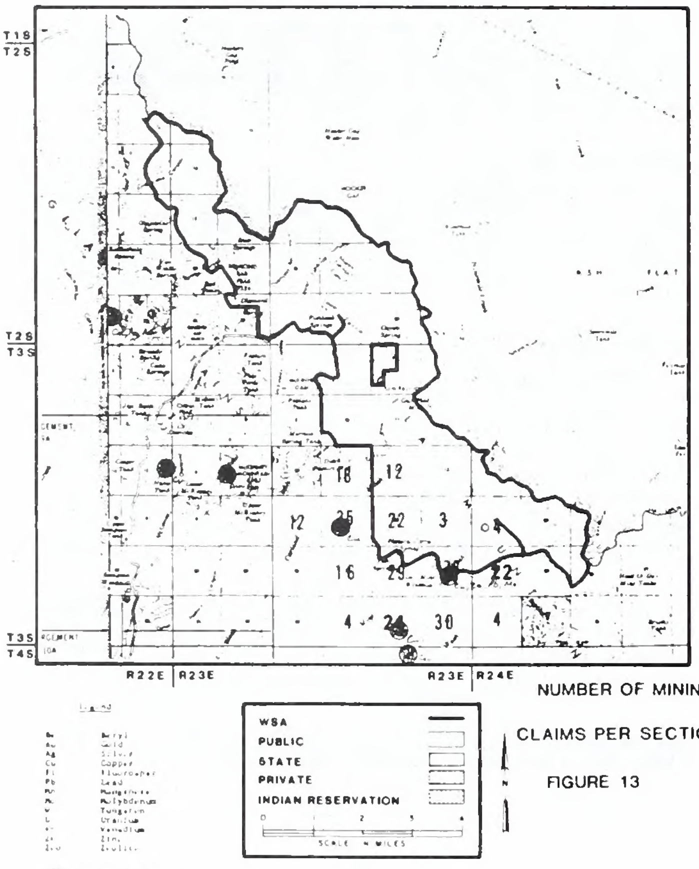

NUMBER OF MINING CLAIMS PER SECTION

FIGURE 13

DAY MINE 4-16

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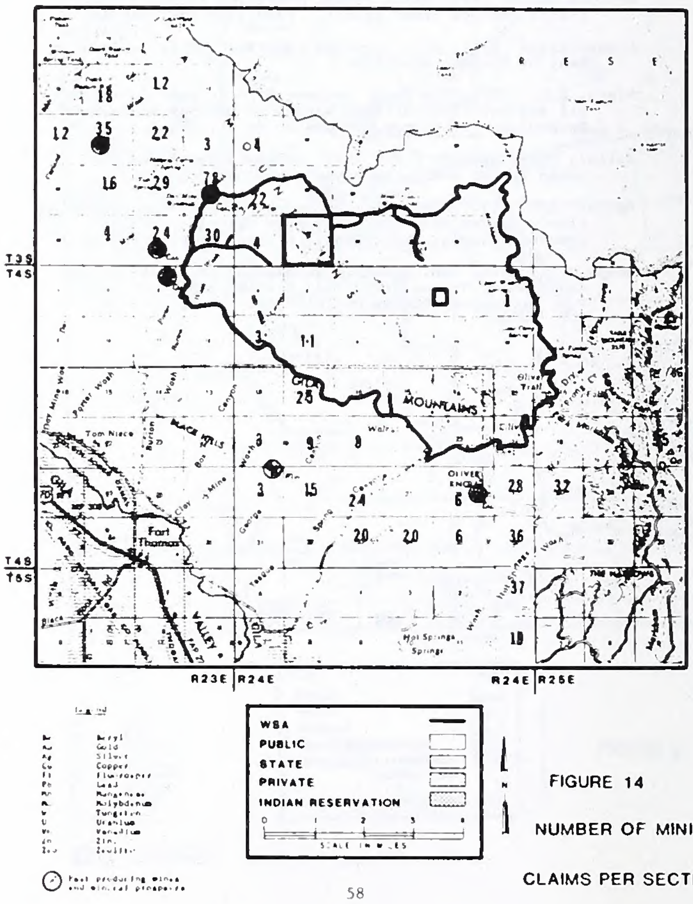

FIGURE 14

NUMBER OF MINING CLAIMS PER SECTION

Turtle Mountain 4-22/23/24 (B) and Gila Box 4/22/23/24 (A)

The Turtle Mountain and Gila Box Wilderness Study Areas are located on the Graham/Greenlee County line approximately 18 miles northeast of Safford, Arizona. The study area occupies portions of Townships 4-6 South, Ranges 28-29 East, GSRBM, and lies at the northern end of the Peloncillo Mountains in the transition zone between the Basin and Range and Colorado Plateau physiographic provinces. Topography in the study area ranges from low rolling hills with shallowly incised drainages to steep walled canyons along and adjacent to the Gila River which transects the study area.

General Geology

The wilderness study areas are underlain by Tertiary volcanic rocks which have been divided into four units. The lowest unit is composed of up to 1,200 feet of red to grey andesite flows and minor tuffaceous breccias, agglomerates, and conglomerates. This unit is overlain by 900 feet of rhyolitic and felsitic flows and tuffaceous sediments. The felsic flows are overlain by a series of thin evenly-bedded, dark grey to greyish-purple flows. This unit has a maximum thickness of 1,200 feet and is separated from the lower two units by a small angular unconformity. The uppermost Tertiary unit is a thick conglomerate with occasional thin layers of tuff. This unit has a maximum thickness of 700 feet. The Tertiary conglomerate is overlain by a Tertiary/Quaternary conglomerate which has a maximum thickness of 400 feet.

Gila Box WSA Discussion

The Draft EIS indicates at page 17 that the proposed action "would not designate as wilderness the Gila Box WSA's 17,831 acres because of conflicts with ORV use in the canyon bottoms." Past and present use of the canyon bottoms by ORV's is an important recreational use of this area dictating against any wilderness recommendation for the Gila Box. 97-18 However, pages 17 and 30 fail to set forth additional reasons which BLM has apparently relied upon previously in deciding against wilderness study qualification and against wilderness recommendation for the Gila Box. These additional reasons should be clearly set forth on pages 17 and 30 in order to fully comply with the dictates of Section 102 of the National Environmental Protection Act (NEPA). These additional reasons obviously include: (1) Designation of Gila Box as a wilderness area will eliminate any option or alternative to construct such facilities as the proposed Camelsback Dam which are badly needed on the Gila and San Francisco Rivers for purposes of flood control and water storage (Draft EIS at pages 2 & 55), (2) Designation of Gila Box as a wilderness area will eliminate any option or alternative to develop the very significant geothermal resources at Gillard Hot Springs (Draft EIS at page 38), and (3) Designation of Gila Box as a wilderness area will restrict access to the San Francisco and Gila Rivers which constitute a very important all purpose recreational area to local residents for recreational activities in addition to ORV use. (*See* Draft EIS at page 41).

97-19 Moreover, the description of the Gila Box Wilderness Study Area on pages 29 and 30 is totally inconsistent with earlier findings made by BLM with respect to the lack of naturalness qualities in portions of the Gila Box Wilderness Study Area. The Draft EIS fails to mention the important fact that the tailings ponds of the Phelps Dodge Morenci operations are located within 330 yards of the northern boundary of that portion of the WSA along the San Francisco

River known as the San Francisco Subunit. The Draft EIS fails to mention that these tailings ponds are growing each year and thereby constitute a growing and ever increasing visual intrusion into the WSA. The Draft EIS fails to mention the following finding made by the Arizona Office of BLM in its Decision Report of November 14, 1980 with respect to these same portions of the WSA:

> The most significant impact cited in the comments was that of the Morenci copper mine. It was determined that there was indeed a significant impact on that portion of the unit east of Eagle Creek (i.e. the San Francisco Subunit). Visitors to this area will find little respite from the sights and sounds of the mine and tailings ponds. The overwhelming nature of these influences has caused us to drop 6,152 acres (i.e. all of the San Francisco Subunit) from the unit. (Emphasis added).

Indeed, the Draft EIS fails to mention the complementary finding of State Director, Clair M. Whitlock with respect to the lack naturalness qualities of this so-called San Francisco Subunit:

> The Phelps Dodge operation, however, is present, and . . . the presence of mining overwhelmingly impacted the naturalness of the sub-unit. We have determined that this outside impact is overwhelming and the natural values of the sub-unit are impaired.

Notice of Final Decision to Nicholas Van Pelt from Clair M. Whitlock of February 24, 1981.

7-20 It is submitted that the Draft EIS cannot be objective and satisfy the requirements of NEPA unless the close proximity of the Phelps Dodge operations and the existence of the growing tailings dams is made very clear on pages 29 and 30 of the EIS.

Appendix A contains four resolutions by the following entities:

1) Graham County Board of Supervisors,
2) Greenlee County Board of Supervisors.
3) Town of Clifton, and
4) Upper Gila River Association.

The resolutions establish the opposition of these entities to any recommendation of portions of the Gila Box Wilderness Study Area as wilderness.

Mineral Potential

Figures 15 lnd 16 show the past and present producing mines and the number of unpatented mining claims in each section for the Turtle Mountain WSA and the Gila Box WSA, respectively,

Porphyry Copper

The wilderness study areas lie between two major porphyry copper mining districts -- the Morenci Mining District located approximately five miles to the northeast, and the Lone Star Mining District located approximately ten miles to the southwest. Substantial work by member companies of the Arizona Mining Association has produced evidence to indicate that a significant possibility exists for additional porphyry copper type mineralization to occur between the two districts and within the boundaries of the wilderness study areas.

The Morning Star property, which lies to the southwest of the wilderness study area, contains an 8' wide vein of copper sulfides with significant gold -- again demonstrating the copper potential of the area.

TURTLE MOUNTAIN 4-22/23/24 (B)

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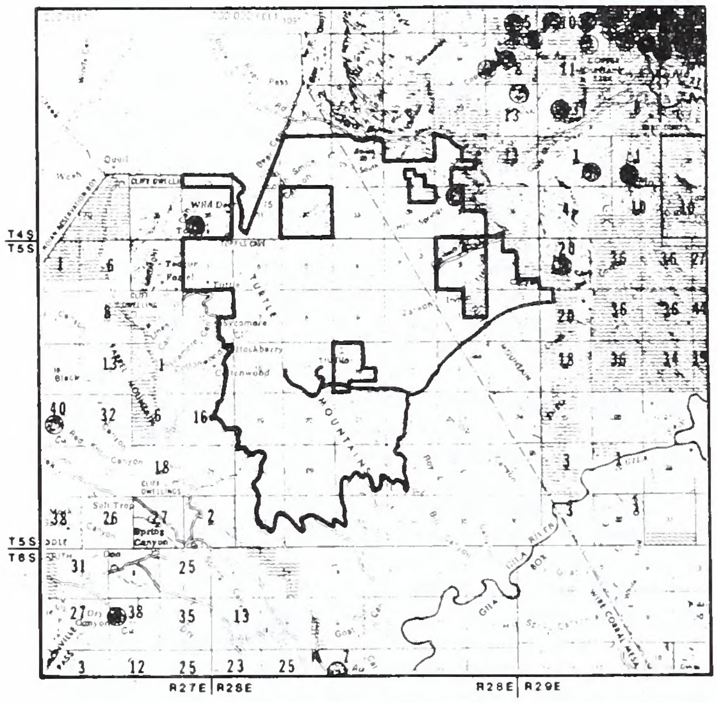

FIGURE 15

NUMBER OF MINING CLAIMS PER SECTION

GILA BOX 4-22/23/24 (A)

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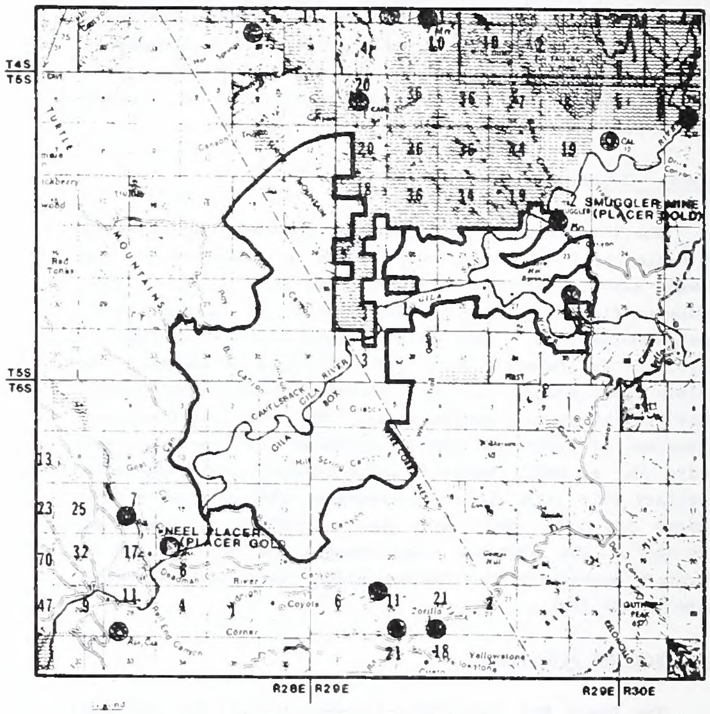

FIGURE 16

NUMBER OF MINING CLAIMS PER SECTION

Placer Gold

Several small placer operations have been worked in and around the wilderness study area. The two most notable are the Smuggler Mine on the San Francisco River and the Neel Placer at the junction of Bonita Creek and the Gila River. There are seven placer claims currently on the Gila River between these two older operations indicating a continuing interest for placer gold in the wilderness study area.

Manganese

Hot springs manganese deposits have been found in veins in the Gila conglomerate in the eastern part of the wilderness study area. Minor production of hand-sorted ore containing up to 40% MnO_2 was made from an 8' wide vein in the Gila Hot Springs group between 1940 and 1955. The ore was shipped to the U.S. Government.

Industrial Minerals

A small amount of pumaceous cinders is currently being produced from a pit south of the wilderness study area for use as lightweight aggregate in concrete. Large volumes of pyroclastic rock occur at the surface in the wilderness study area and some of these may have the necessary characteristics to serve as a source of lightweight aggregate.

Geothermal

Several areas in and around the wilderness study area have geothermal potential. The Gillard Federally Known Geothermal Resource Area lies in Section 27, T 5 S, R 29 E and discharges waters up to 82° C, the hottest discharge temperatures in Arizona. A State Known Geothermal Resource Area, Clifton (Eagle Creek) Hot Springs, lies in Section 35, T 4 S, R 28 E and discharges waters up to 30° C. These springs lie on a N 40° W trend of lineaments which may localize hot waters. A number of geothermal lease applications exist in the wilderness study area.

Oil Leases

The wilderness study area may lie within the same overthrust belt which contains large oil and gas fields in Wyoming and Utah to the north as well as in Chihuahua, Mexico to the south. This overthrust is thought to extend through Arizona and has resulted in a considerable amount of exploration activity. Current interest in the wilderness study area is demonstrated by the large number of oil and gas leases held in the area.

Conclusion

The Turtle Mountain and Gila Box Wilderness Study Areas contain a number of possible targets for mineral exploration and development. The geothermal possibilities may have the greatest potential for development. Because the wilderness study areas do contain definite possibilities for production, the area should be assigned to a multiple land use classification. In addition, as a result of the sights and sounds of the North American Continent's second largest copper mine and the future upward extension of Phelps Dodge's Southwest Tailings Dam System, to the point where the dam face can be viewed from most locations within the Gila Box WSA, the Arizona Mining Association strongly supports the Safford District's conclusions in the Proposed Action to delete both the Gila Box WSA (4-22/23/24 (A)) and the Turtle Mountain WSA (4-22/23/24 (B)) from further consideration.

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Javelina Peak 4-48

The Javelina Peak Wilderness Study Area (AZ 4-48) lies on the southwest flank of the Whitlock Mountains in southeastern Arizona. The study area occupies portions of Townships 9 and 10 South, Ranges 28 and 29 East, GSRBM, in Graham County. Access to the area is by well maintained gravel roads approximately 25 miles southeast from Safford, Arizona or approximately 15 miles north from Bowie, Arizona.

Approximately 75 percent of the study area is represented by alluvial fans or low-lying flat areas being somewhat dissected by arroyos which intermittently contain water. This is a trait quite typical in the intermontane basins in the arid environment and basin and range physiographic province of the southwestern United States. The remaining 25 percent or northeast quarter of the study area is occupied by small inselberg-type hills and relatively rugged peaks of the southern Whitlock Mountains. Elevations in the study area range from approximately 3,400 feet near the San Simon River in the southwest to 4,000 feet at the base of the Whitlock Mountains, 3.5 miles northeast of the San Simon River, to 5,592 feet at Javelina Peak on the crest of the range.

General Geology

The Whitlock Mountains are a northwest trending mountain range typical of the basin and range physiographic province in southeastern Arizona. They are composed of a series of layered Tertiary volcanic rocks varying in composition from a porphyritic andesite to quartz latite, pyroclastic breccia, rhyolite and basaltic andesite. These formations range in age from 29 million years to 23 million years respectively.

The low-lying areas are underlain by Quaternary deposits consisting of alluvium on active flood plains adjacent to the San Simon River, lacustrine and alluvial deposits of fine to coarse grained clastic rocks and unconsolidated material, and older alluvial deposits consisting primarily of broad low gradient alluvial fans and pediment gravel.

Mineral Resource Potential

The region surrounding the Javelina Peak Wilderness Study Area has seen little in the way of hard rock mineral prospecting activity. Currently, there are two lode mining claims which lie just outside the area in Section 20, T 9 S, R 29 E. According to Richter, et al (1981), "no metallic occurrences are known within the area, but upper Mesozoic-lower Cretaceous intrusive and extrusive rocks which contain significant porphyry

copper deposits in the Safford area, 25 kilometers to the northwest, may underlie the map area at a relatively shallow depth".

The region within and immediately surrounding the Javelina Peak Wilderness Study Area has been the site of much in the way of soft rock mineral prospecting activity. The area has a significant potential for uranium and zeolite mineralization. Approximately six miles north of the wilderness study area in Sections 9, 21, 22, 23, 27, 28, T 8 S, R 28 E, uranophane and carnotite occurs as coatings on fractures, seams, and in 12-15 foot thick units of siliceous lake bed material, tuffs, and gravels units associated with bentonitic clay and diatomaceous earth. Exploration to date in these areas has been by dozer cuts, prospect pits, and shallow shafts. It is anticipated that the same formations present in the wilderness study area would indicate a potential for uranium mineralization as seen in these formations to the north.

According to Pierce, et al (1970, page 131), "lake sediments containing tuff and ash beds, sediments close to areas of volcanic activity, and interbedded arkosic sediments and volcanics are particularly interesting for [uranium] exploration".

The largest known deposit of naturally occurring zeolites in the United States occurs three miles south of the wilderness study area with current claims, located for the purpose of zeolite development, lying only one mile from the southern boundary of the wilderness study area.

The Bowie zeolite deposit is located in the San Simon Mining District in Townships 11, 12 South, Range 28, 29, 30 East, GSRBM, approximately 10 miles north of Bowie, Arizona (Figures 17&18). The district occupies approximately 45 square miles and is disected from northwest to southeast by the intermittent San Simon River. Bank erosion has resulted in the removal of more than 14 square miles of shallow lying zeolitized tuff units along the channel in the center of the district, limiting prospecting and mining operations to relatively higher elevations on either side.

The San Simon Valley, in the vicinity of known zeolite occurrences, is underlain by nearly flat-lying fluviatile and lacustrine deposits which workers in the region have considered to be late Pliocene to Holocene in age. Zeolitized tuffs are interbedded with lacustrine sediments in the upper portions of the stratigraphic section. The tuffs crop out locally along the San Simon channel forming a very distinctive, erosion resistant unit known as the Marker Tuff. Sheppard et al (1976) indicate the Marker Tuff is 8-50 inches thick and seems to increase in thickness to the south. The unit is composed of a 4-8 inch basal bed which is overlain by a variable thickness of thin to very

thin tuff beds. The basal bed, commonly termed the ore bed consists of 60-95 percent total zeolite primarily a chabazite but erionite and clinoptilolite are also present. The upper units contain 30-70 percent zeolite, also as chabazite, erionite, and clinoptilolite.

Production from the Bowie zeolite deposit was started in 1961 by the Union Carbide Corporation. Currently, seven companies are involved in the deposit including Union Carbide Corporation, the Anaconda Company, N.R.G. Corporation, J. M. Phillips, W. R. Grace Company, Norton Company, and Letcher and Associates.

A combined production of 1,500-2,000 tons of chabazite per year was reported in two separate publications written on Bowie zeolite in 1978. Recent discussions with the Arizona Department of Mineral Resources confirms the "in the neighborhood of 1,500 tons per year" figure. That State agency also commented that the price ranges from $100 to $2,000 per ton, but averages $1,000 per ton.

No specific information on reserves is available. However, reports indicate that "reserves are conservatively estimated at several million tons of high grade chabazite." Rough calculations based on one 6-inch thick ore bed, a chabazite density of 108 pounds per cubic foot, 7,000 acres of production, and 20,000 to 30,000 tons removed to date, indicate reserves to be in the neighborhood of 8.2 million tons.

The Bowie zeolite deposit is hosted with an interbedded lacustrine and alluvial deposits, with occassional interbeds of volcanic ash which have been zeolitized due to the prevailing depositional environment; i.e. high pH and abundance of alkali metals. The probability may be quite high that additional zeolites of this type exist in similar geologic settings much like that of the western 60 percent of the Javelina Peak Wilderness Study Area.

Presently, oil leases are held on 28 of 33 sections lying within the boundaries of the Javelina Peak Wilderness Study Area. These sections are noted in Figure 19.

Conclusion

Due to the significant uranium and zeolite potential in and around the Javelina Peak WSA as well as the low to moderate potential for a buried porphyry copper system, the Arizona Mining Association strongly agrees with the conclusion of the Safford BLM office that this area should be deleted from further consideration as wilderness, as set forth under the Proposed Action alternative.

JAVELINA PEAK 4-48

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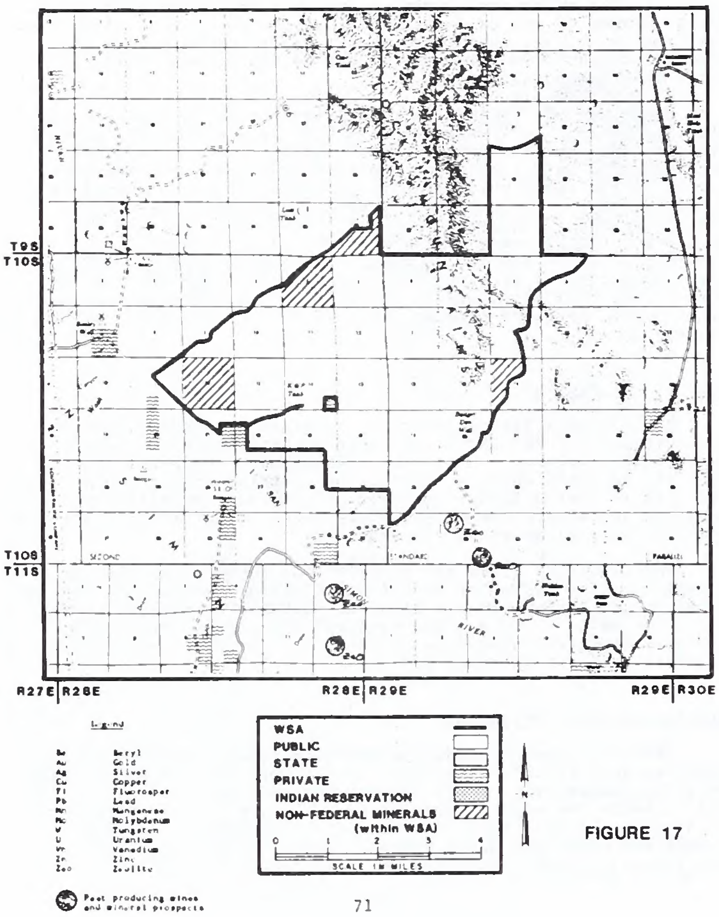
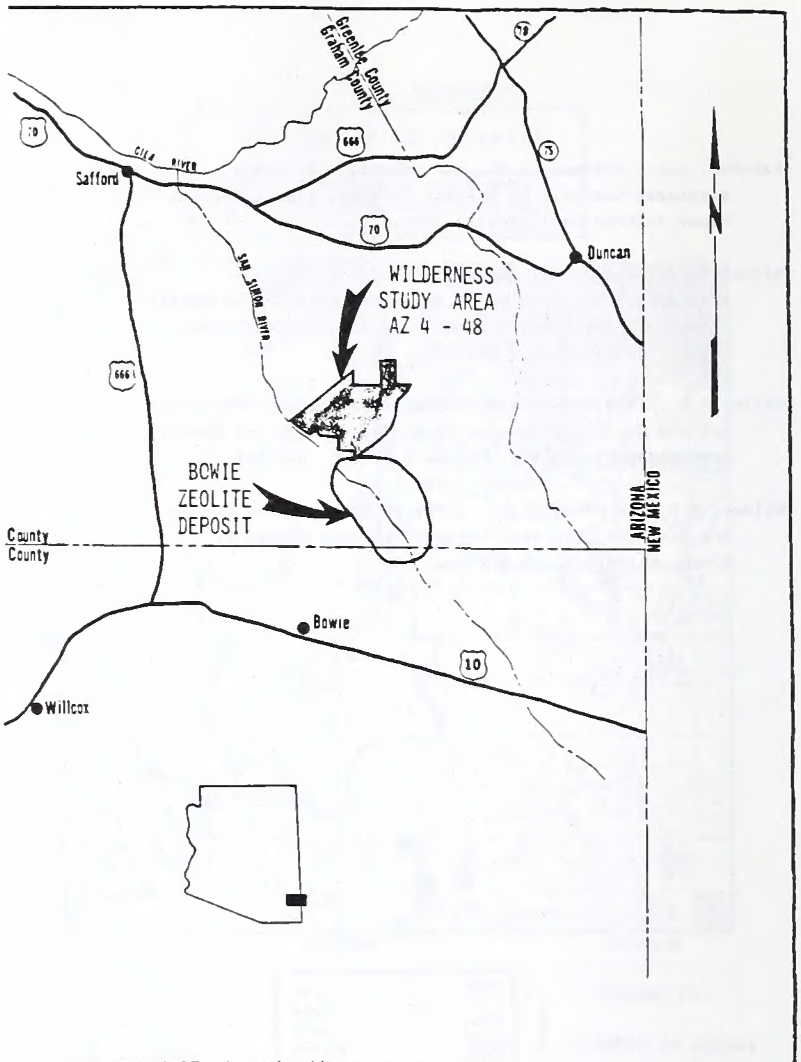


FIGURE 17



BOWIE ZEOLITE - Location Map FIGURE 18

Scale 1:50,000

JAVELINA PEAK 4-48

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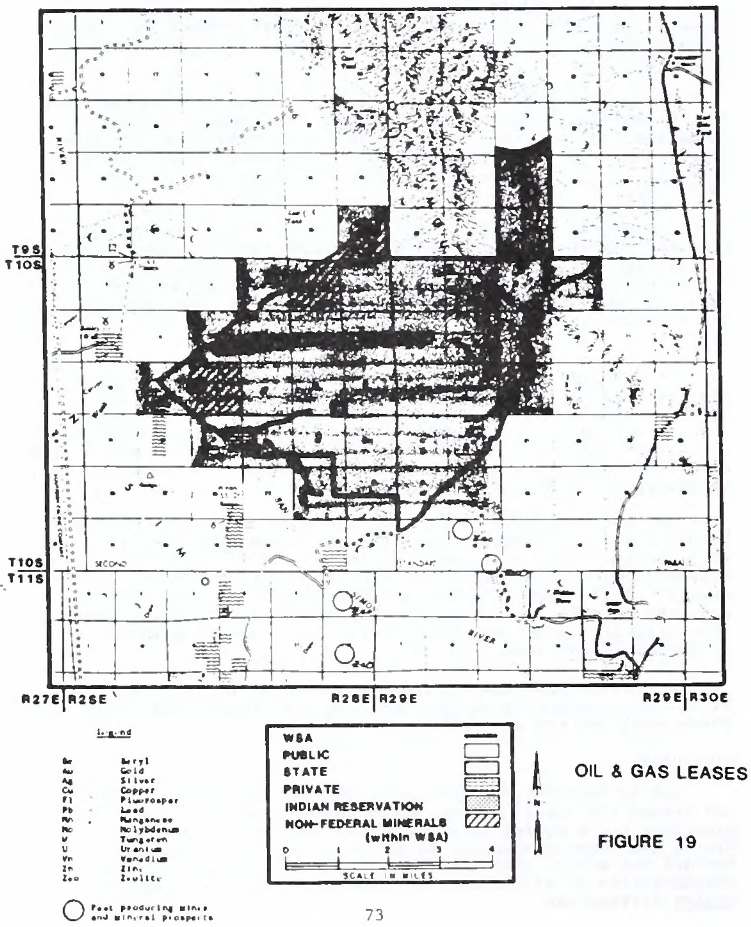

OIL & GAS LEASES

FIGURE 19

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Peloncillo Mountains 4-60

The Peloncillo Mountains Wilderness Study Area (AZ 4-60) is located in southeastern Arizona and southwestern New Mexico in Greenlee, Graham and Cochise County, Arizona and Hidalgo County, New Mexico. The comments presented here address the mineral potential of the area based upon available literature.

Geographic Setting

The Peloncillo Mountains (WSA 4-60) consist of 12,317 acres located in a northwest trending mountain range. The Animas Valley forms lowlands to the east and the San Simon Valley forms lowlands to the west. Numerous canyons cut deeply into the Peloncillo Mountains in the wilderness study area. Vehicle routes and trails occur within the wilderness study area. The elevation ranges between 4,200 and 6,400 feet(Figure 20).

General Geology

The Peloncillo Mountain is in one of the series of mid-Tertiary volcanic mountain ranges in the Basin and Range Province in Arizona and New Mexico. The major north-northwest trend of the mountain range reflects the Basin and Range faulting along the mountain fronts.

The geology consists of mid-Tertiary volcanic rocks underlain by Laramide andesite and dacitic flows and propylitized volcanic breccia. Paleozoic limestones probably underly the Laramide andesites but are not exposed.

The overall geologic structural pattern is arcuate in the wilderness study area, suggestive of a caldera complex similar to that which controls mineralization in many precious metal mining districts. Northeast trending structures occur in Doubtful Canyon as faults, mid-Tertiary dikes and alignment of small mid-Tertiary rhyolitic plugs. North to northwest faults are cut-off by east to northeast radial structures. The pattern may reflect doming or collapse of a magma chamber at depth. Four eruptive sequences of rhyolite to quartz latite domes, flows, dikes, and associated sequence of breccia zones occur.

Mineral Resource Potential

The mineral resource potential should be considered moderate to high. Types of ore deposits that could occur within the Peloncillo Mountains Wilderness Study Area (4-60) are 1) porphyry copper molybdenum deposits; and 2) precious or base metal vein deposits.

Laramide-aged intrusive and extrusive rocks similar to those which contain significant porphyry copper and skarn deposits in the Safford Lordsburg-Silver City area in all probability underly the Wilderness Study Area at relatively shallow depths.

Nearly all porphyry copper deposits in the Southwestern United States are associated in time and space with 50-75 million year old bodies of igneous rock that were emplaced a few kilometers below the earth's surface. By mid-Tertiary time (C.A. 30 million years ago), erosion had stripped the layers of rock from above the majority of deposits, exposing them to near-surface processes which leached low-grade mineralization from a large volume of rock and concentrated it into tabular high-grade ore bodies. These enriched zones, called supergene blankets, were protected from erosional destruction by mid- and late-Tertiary volcanic and sedimentary cover. The prevailing problem in porphyry copper exploration is associated with locating deposits beneath these younger strata. Current exploration tools are virtually ineffective in detecting copper mineralization beneath volcanic cover. However, new techniques may be developed in the future, and unfettered access would be essential in order to evaluate potential deposits. The Peloncillo Mountains (WSA 4-60) are an attractive target for such exploration, due to:

1) The wilderness study area lies within one of the largest copper provinces in the world, and is in close proximity to several known deposits. Case histories have shown that exploration projects near known deposits are usually more successful than those in the virgin territory (Bailly, 1972).
2) Nearby ore bodies (Morenci, Tyrone, and Santa Rita) have well-developed supergene blankets, indicating that the mid-Tertiary erosional surface of the region was near enough for any low-grade mineralization to form high-grade ore.
3) The units are covered by mid-Tertiary volcanics, which would protect the possible ore body from erosion. Volcanics of similar age also covered the Morenci and Santa Rita ore bodies; erosion, however, exposed enough of the ore bodies that they were discovered by surface inspection.

Recent studies by a number of workers have suggested that the processes which form volcanic basins (cauldrons) may also be responsible for precious and/or base metal deposition along the edges of the basins (i.e. Steven, et al, 1974; Lipman, et al, 1976; Elston, et al, 1976; Elston, 1978). Mining districts (and metals produced) that are thought to be related to cauldron formation include: Creede, Colorado (Au, Ag, Pb, Zn, Cu, Mn, CaF_2, and $BaSO_4$); and Mogollon, New Mexico (Au, Ag).

The gold-silver veins of the Kimball district two miles to the south of the wilderness study area are associated with rhyolite domes in what appears to be an east-west segment of a ring fracture zone (Elston, 1976). The north end of the Peloncillo Mountains has the aspect of a cauldron complex but has never been mapped in detail. Unfortunately, because of the lack of published geological maps of Peloncillo Mountains Wilderness Area this area has been poorly explored.

Approximately two miles south of the Peloncillo Mountains Wilderness Study Area the mineralized Steins Pass or Kimball Mining District occurs. The mines are epithermal precious metal gold and silver deposits within veins of brecciated rhyolitic tuffs. The Volcano Mine located in Section 17, T 23 S, R 21 W, two miles south of the Wilderness Study Area was the largest producer of gold and silver in the area and was mined at a rate of 200 tons per week in early 1982. The mine is situated on a silicified vein along a fault in rhyolite tuffs and flows. The vein is up to 50 feet wide and strikes nearly north-south to northwest towards the Wilderness Study Area. Other mines in the district are the El Oro and National or Beck Mine, which have produced silver gold, copper lead and zinc.

Oil and Gas

Exploration for oil and gas is continuing in the Peloncillo Mountains Wilderness Study Area. Bureau of Land Management oil and gas leases in the wilderness study area are shown in Figure 21. The "Overthrust Belt" in Arizona may contain hidden oil and gas deposits (Keith, 1979).

Conclusion

The Bureau of Land Management Peloncillo Mountains Wilderness Study Area 4-60 has a low to moderate potential for various mineral resources including porphyry copper-molybdenum deposits, and base and precious metal deposits. Oil and gas resources may exist within the wilderness study area.

The Arizona Mining Association supports the decision by the Safford District BLM office to delete this area from further consideration under the Proposed Action alternative.

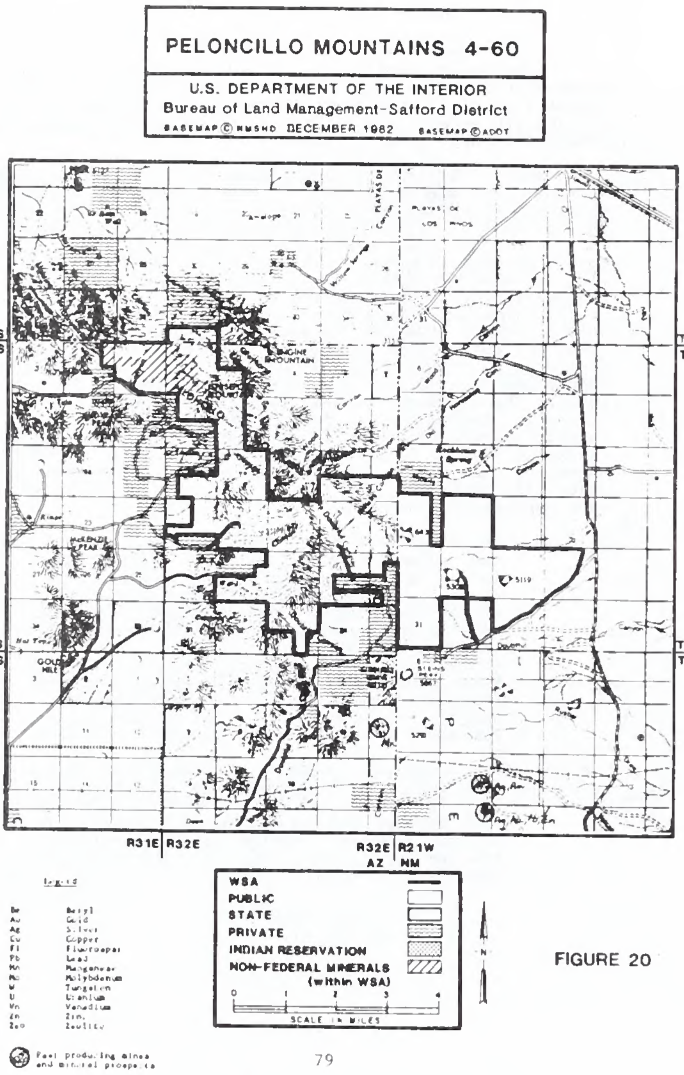

FIGURE 20

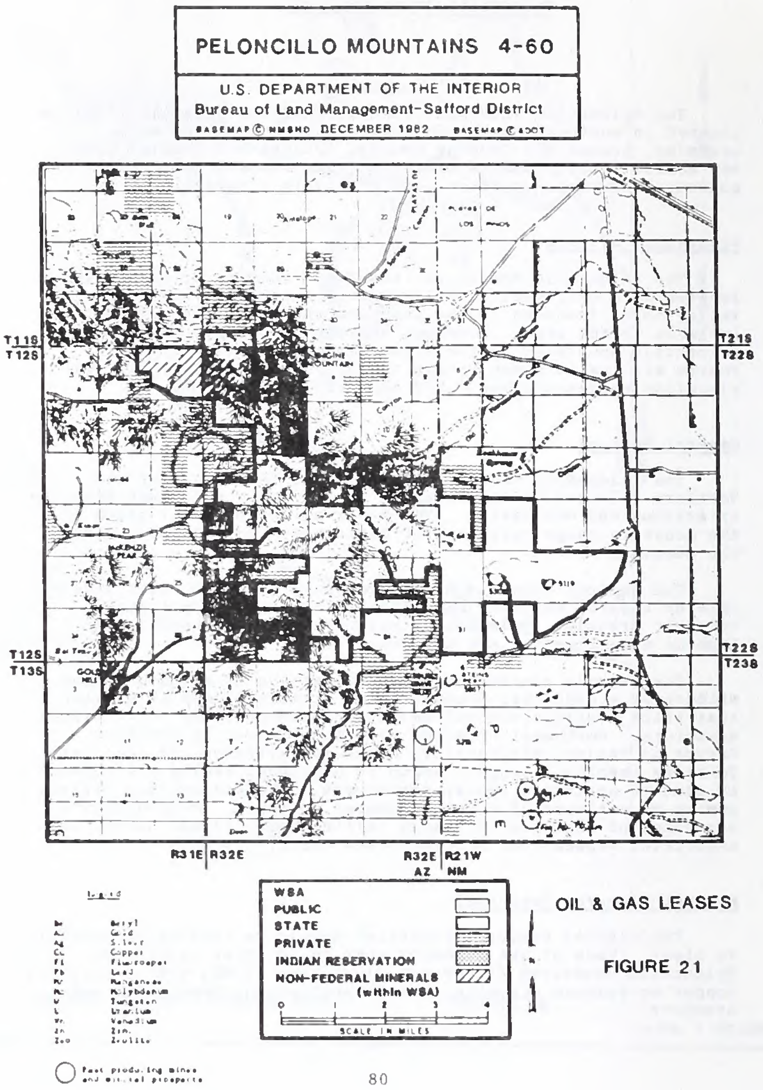

FIGURE 21

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Happy Camp Canyon (4-65)

The Happy Camp Canyon Wilderness Study Area (AZ 4-65) lies in the Dos Cabezas Mountains in the north-central part of Cochise County in southeastern Arizona. The comments presented here address the mineral potential of the BLM Happy Camp Canyon WSA based upon geological investigations of Arizona Mining Association member companies' unpatented mining claims in the WSA and available literature on mining properties within and surrounding the study area.

Geographic Setting

The Happy Camp Canyon WSA contains approximately 16,761 acres. The area consists of mountainous terrain that varies in elevation from 4040 to 7968 feet. The climate is arid with occasional light snows. Access to the WSA is by the Bowie - Dos Cabezas road on the west, Happy Camp Canyon road on the east, Silverstrike Mine-Fort Bowie road on the southeast, Wood Canyon road on the south and Bean-Howard Canyon road on the southwest. Old roads and jeep trails crosscut the WSA in the Buckeye-Apache Mine area and in Happy Camp Canyon. Private land and old mines occur within the WSA in Sections 3, 10, and 11 in T. 14 S., R. 27 E., Sections 5, 7, 8, 16, 23, 29 and 30, T. 14 S., R. 26 E., (Figure 22 and Table 4).

General Geology

The geology in the Happy Camp WSA consists of Precambrian metasediments and granite intrusions overlain by Paleozoic-Mesozoic sediments and Laramide volcanoclastics and intruded by Laramide and mid-Tertiary stocks. West-northwest faults parallel the Dos Cabezas Mountains with north-trending steeply dipping faults localizing some mineralization. Paleozoic and Mesozoic limestones and shales generally have steep dips and are occasionally overturned.

Mineral Resource Potential

Important mines and prospects in the Dos Cabezas and Teviston Mining District occur within the western edge of the proposed Happy Camp WSA in Sections 2, 3, 4, 8, 8, 10, 11 and 15, T. 14 S., R. 27 E. (Figures 22,23&24). Other mineralized areas occur within the WSA as shown in Figures 22&23 but have not been completely explored.

Minerals of economic importance in the Happy Camp WSA are gold, silver, silica, copper, lead, and zinc. Other elements present that may be economic are tungsten, iron, uranium, fluorine, manganese, bismuth, and beryllium. The Happy Camp WSA has a very high mineral potential. Of particular importance are areas surrounding the old Buckeye-Apache Mines, extensions of mineralization on the Sunrise patented claims within the WSA in Section 3, T. 27 E., R. 14 S., and extensions of mineralization in the Elma Mine, Mascot Mine and the Dives-Gold Prince under the Happy Camp WSA. The Dos Cabezas-Teviston Mining District is reported to have produced about 100,000 tons of ore containing about 2,000 tons of copper, 700 tons of lead, 19 tons of zinc, 430,000 ounces of silver and 10,000 ounces of gold (Keith, 1973). A description of mines in and surrounding the Happy Camp WSA follows.

Buckeye and Apache Mines

The Buckeye and Apache mines are located in Happy Camp WSA in Sections 3 and 4, T. 27 S., R. 14 E. Limited production and development occurred on the Buckeye mine from 1880 to 1892, 1930 to 1935, 1945 to 1949 and 1955 to 1957. Development work consisted of underground drifting, stoping and construction of mine facilities including a 150 ton crushing mill and gravity separation mill. Shipment of 19 tons of concentrates in 1946 reportedly ran 29.50 ounces of gold per ton and 15.4% lead, (Buckeye-Apache Mine Company Prospectus, 1946). Exploration and development work is currently underway on the Buckeye-Apache mine in the WSA and development on the Gold Farms Mine 1/4 mile outside the western boundary of the WSA. Exploration, development, and mining on the Buckeye and Apache mines have been delayed by the 43 CFR, Subject 3802 Explanation and Mining - Wilderness Review Program and the Interim Management Policy and Guidelines for Lands Under Wilderness Review. As a result exploration drilling, roadbuilding, and mining of the Buckeye and Apache veins would be hampered and mining would be nearly impractical.

The geology of the Buckeye and Apache Mine area consists of Precambrian medium to coarse grained granodiorite cut by shallow-dipping 3 to 12 feet wide white siliceous veins. The granodiorite is in fault contact with Precambrian Pinal Schist to the north and is overlain by Laramide volcanic andesite flows and tuffs to the south. South of the Buckeye-Apache Mine area Laramide volcanics and volcanoclastics near the Elma Mine have porphyry copper potential.

Elma Mine

The Elma Mine is located adjacent to the WSA in Section 9, T. 14 S., R. 27 E. The orebody occurs in Laramide brecciated volcanics intruded by granite porphyry and plunges underneath the WSA to the east. The Elma Mine has been developed on six levels at intervals of approximately 85 feet each, to the 500 foot level. The deposit is one of many possible intrusive breccia pipes that have the potential to be associated with a porphyry copper deposit. Breccia fragments and matrix have been partially to totally replaced by copper, zinc, and lead minerals (chalcopyrite, bornite, chalcocite, sphalerite, galena).

Mineralized Vein in Section 2 and 11

Mineralized veins of silica with precious metal values occur east of the Buckeye and Apache mines in Sections 2 and 11, T. 14 S., R. 27 E., in the WSA. Mineralization consists of four large and many small quartz veins ranging up to 20 feet wide and 500 feet long. These quartz veins occur in and around Precambrian quartz monzonite intruded into gneisses and Precambrian Pinal Schist. The veins are estimated from the surface exposures to contain 200,000 tons of precious metal bearing siliceous material.

Mascot Property

The Mascot Property is located in Section 15, 16, 17, 20, 21, 22, 27, and 28, T. 14 S., R. 27 E., adjacent to and slightly within the western part of the Happy Camp WSA. Mineralization consists of contact metamorphic and fissure veins of copper and iron (chalcopyrite, pyrite and magnetite). A Laramide plug intrudes the Precambrian and Paleozoic metasediments and Laramide brecciated volcanics. Minor lead-zinc mineralization is present. Ore bodies occur in structurally prepared fissure veins and contact metamorphic replacements in Paleozoic limestones and as localized occurrences of disseminated sulfide in Laramide volcanics. The potential for a large tonnage copper deposit may be present within the western part of the WSA hosted in the Laramide andesitic volcanics.

Dives-Gold Prince Property

The Dives-Gold Ridge-Gold Prince property was discovered prior to 1880. Intermittent small scale mining continued on all properties with major work occurring between 1918 and 1921 when underground workings were developed and a 25 ton mill was installed.

The most widespread ore mineralization in the Dives-Gold Prince Mines is gold and silver-bearing veins of quartz with base metal sulfides. The principal group of veins occupies fractures within a northwest-trending shear zone. The veins are in Paleozoic Mesozoic shales, limestones and sandstones that lie to the north of a fault contact with Precambrian granite rock.

The gold and silver veins lie directly adjacent to the southwest boundary of the WSA in Sections 22, 27, and 26, T. 14 S., R. 27 E. The large vein of quartz extending for 2 miles from the west dips to the northeast probably under the WSA.

Rough Prospect

The Rough #1 and #2 prospects are located in the center of the Happy Camp WSA in Section 18, T. 14 S., R. 28 E. Tungsten mineralization occurs as narrow veinlets and disseminated scheelite within an amphibolite schist. A stockpile of ore at the discovery outcrop ran 1.34% WO_3. Tungsten mineralization can be detected 1/2 mile below the discovery outcrop (Dale, 1960).

The Rough Prospect has not been thoroughly evaluated within the WSA.

Ram Prospect

The Ram Prospect is located in the WSA in Section 21, T. 14 S., R. 28 E. Tungsten mineralization occurs in altered limestone beds exposed for 200 feet by shallow open-cuts. Numerous mineralized tungsten prospects occur in this area.

Austin Mines

The Austin Mine occurs within the WSA in Section 30, T. 14 S., R. 28 E. Tungsten mineralization is associated with lead sulfides and lead carbonate in an altered limestone. Past development consists of a 40' deep shaft that exposes a 30" vein of 2.0% scheelite. A 60 ton stockpile on the property averaged 1.38% WO_3. Approximately 2000 tons of 1% WO_3 has been inferred to be present in the old mine workings.

Silver Bell

The Silver Bell Prospect is partly located in the WSA in Section 9, T. 14 S., R. 28 E. Tungsten mineralization occurs in a two meter wide quartz vein that intrudes Paleozoic limestones. The quartz vein contains galena, sphalerite and scheelite. A larger tungsten deposit may occur in the WSA at depth.

Silver Strike

The old Silver Strike Mine occurs on the southeast border of the WSA in Section 28, T. 14 S., R. 28 E. Mineralization of tungsten, lead, zinc, copper, and silver occur in quartz veins. Quartz veins strike N62°E and dip at 80°SE. Scheelite occurs in silicated limestone that strikes into the WSA, (Dale, 1960).

Mine workings occurring on the Silver Strikes Mine are an 80' deep shaft, numerous adits and shallow open-cuts. Tungsten mineraization ranges from .04 to .14% WO_3. Several thousand tons of tungsten mineralization have been inferred by Arizona Department of Mineral Resources engineers.

Beryl Hill Prospect

The Beryl Hill - Live Oak Prospect occurs in the WSA in Section 23, T. 14 S., R. 28 E. Gemstones and industrial beryl occurs in a pegmatite in porphyritic granite. The beryl veins increase to 26" at depth and assay from .18 to 8.9% BeO. A 22' long by 4' wide by 12' deep open-cut occurs in the WSA that beryl was mined from. Similar if not larger beryl occurrences may occur in the WSA.

Placer Gold

Placer gold deposits occur on the north and south flanks of the Dos Cabezas Mountains with the most actively worked placers located in Section 27 and 34, T. 14 S., R. 27 E., slightly outside the WSA. The gold-bearing gravels in the gulches are thin near the mountains and thicker toward the south near the village of Dos Cabezas (Wilson, 1961).

Oil and Gas

Exploration for oil and gas in southeastern Arizona has been on the rise in the last few years due to a proposed continuation of the Overthrust Belt through Arizona (Keith, 1979). Federal oil and gas leases have been obtained by oil companies in many areas of the Happy Camp WSA as shown in Figure 25.

Conclusion

The mineral resource potential of the Happy Camp Canyon WSA should be considered high for: precious metal and base metal vein deposits (Buckeye, Apache, Sunrise, Gold Prince mines, etc.), replacement and contact metamorphic skarn deposits (Mascot Mines), mineralized breccia pipes and porphyry copper deposits (Elma Mine area) and tungsten deposits (Rough, Ram, Austin, and Silver Bell).

Active mineral exploration is continuing at present within the western part of the WSA and attempts have been made to renovate old mines within the western boundary of the WSA. Drilling roads east of the Elma Mine are still accessible and active exploration for large toonage porphyry copper deposits is proceeding.

The Safford District BLM office has done an admirable job of reducing the boundaries of the WSA in the Proposed Action alternative to exclude as much of the highly mineralized and current and past exploration areas from the WSA. The Arizona Mining Association does request the Safford BLM to delete any of the lands that would qualify in the recent directive from Secretary of the Interior James Watt and the recent IBLA decision to exclude federally-owned surface estates from the wilderness review program which overlies fee mineral estate lands.

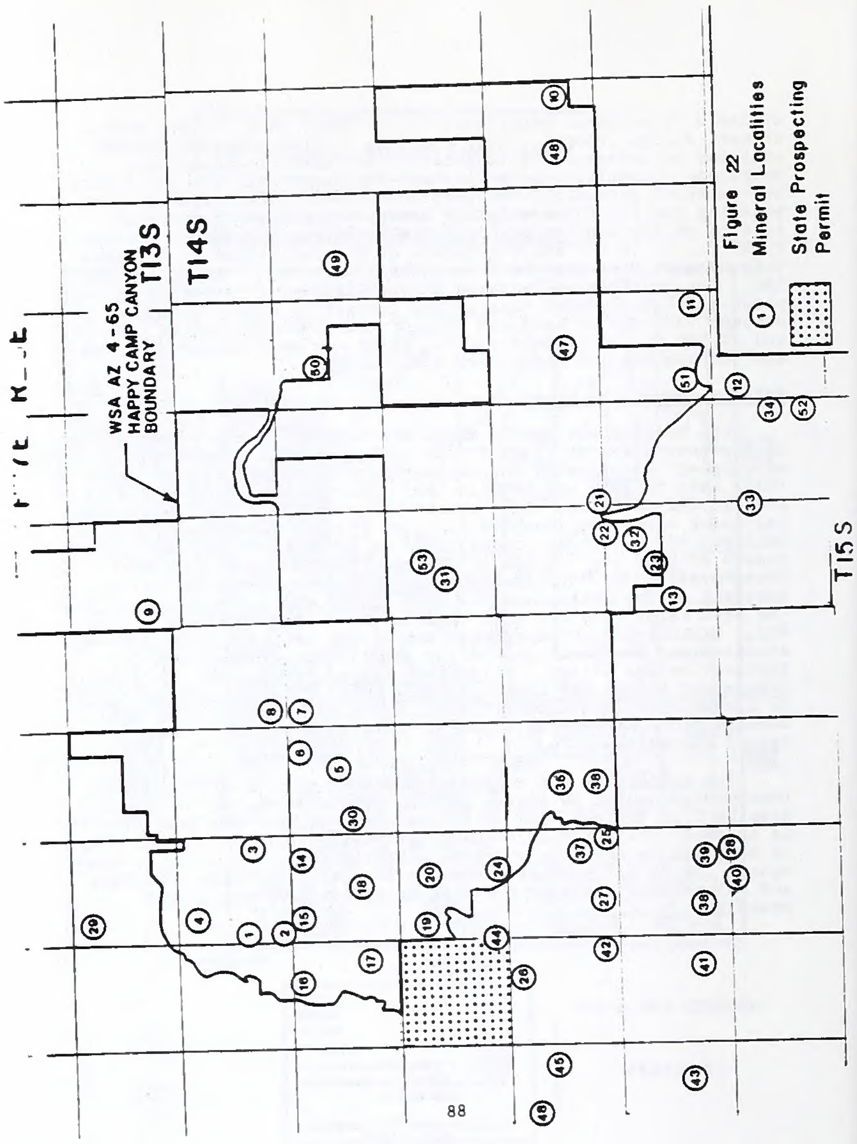

Table 4. (reference to Figure 22)

MINERAL LOCATIONS AND PROSPECTS (AZ 4-65)

Owner (Map Reference)	Claims	Number Of Claims
Phelps Dodge Corporation (1)	BA 1-28	28
Gold Depository & Loan (2) (3) (4) (4A)	Buckeye 1-58 Conexion 1-20 Apache 1-16 John 1-3	59 21 6 3
Browne, W.C. (5) (6) (7) (8)	Natural Nora Auntie Ruth Varga Queen Bee Jo Anne Queen Bee	1 1 1 1
Browne, W.C. (9)	Marvellous Maggie Precocious Peggy	2
Cox, H., S., J. (10)	Beryl Hill #1-3	3
Cox, H., S., J. (11)	Beryl Hill #2	1
Texas Gulf Western Inc. (12) (13)	Amy 11-29 Amy 1-10	19 10
U.S. Coal (14) (15) (16) (17) (18) (19) (20)	Jake 1-9 Sarah 1-9 Lobo 1-9 Miller 1-9 Joe 1-9 Karen 1-9 Betty 1-9	10 10 10 10 10 10 10
Reid, A.L. (21)	Swede 1-8	8
Harm, F. (22)	Last Chance	4
Pursley R.A. (23)	Tiger #1	1
U.S. Coal (24)	Jan 1-8	9
Barry, W. (25)	Klondykle 1-4 Arizona 1-3	7
	Hidden Treasure	1
Mascot Mine (26)	Mascot Patented Lands	30
Gold Ridge (27)	Dos Cabezas Mining	23
Anderson (28)	Gold Queen	1

Table 4. (Continued)

ADDITIONAL PROSPECTS AND PREVIOUSLY OPERATING MINES

(29)	Buckeye Canyon Prospect
(30)	Howell (Red Jacket, Lowmill, Grade E)
(31)	Rough
(32)	Austin Mine
(33)	Rattler Group
(34)	Uranium Hill Claims
(35)	Bean Manganese Prospect
(36)	Howard Group
(37)	Arizona Klondyke Group
(38)	Gold Prince
(39)	First Chance
(40)	Leroy Mine Group
(41)	Gold Ridge
(42)	Ewell Spring Mine
(43)	Dives
(44)	Mascot Mine Extension
(45)	Honey Dew Mine Group
(46)	Dos Cabezas Queen Mine
(47)	Ram Claims
(48)	Beryl Hill & Live Oak Project
(49)	Dos Cabezas Placers
(50)	Silver Bell Claims, Ella Shaft
(51)	Silver Strike Mine
(52)	Typest Group
(53)	Rough #1 and #2

HAPPY CAMP CANYON 4-65

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Managament-Safford District
DECEMBER 1982 BASEMAP © ADOT

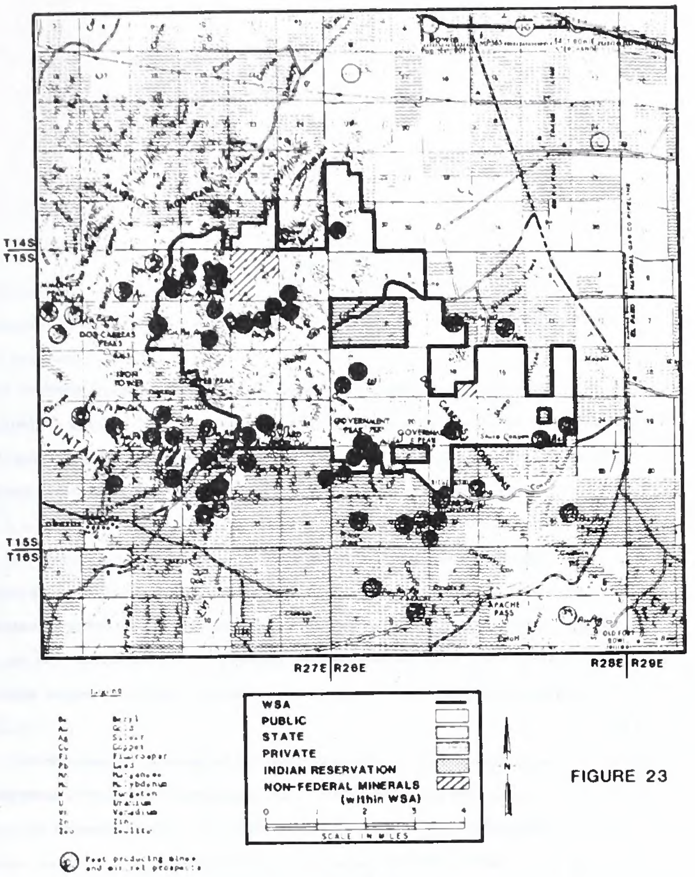

FIGURE 23

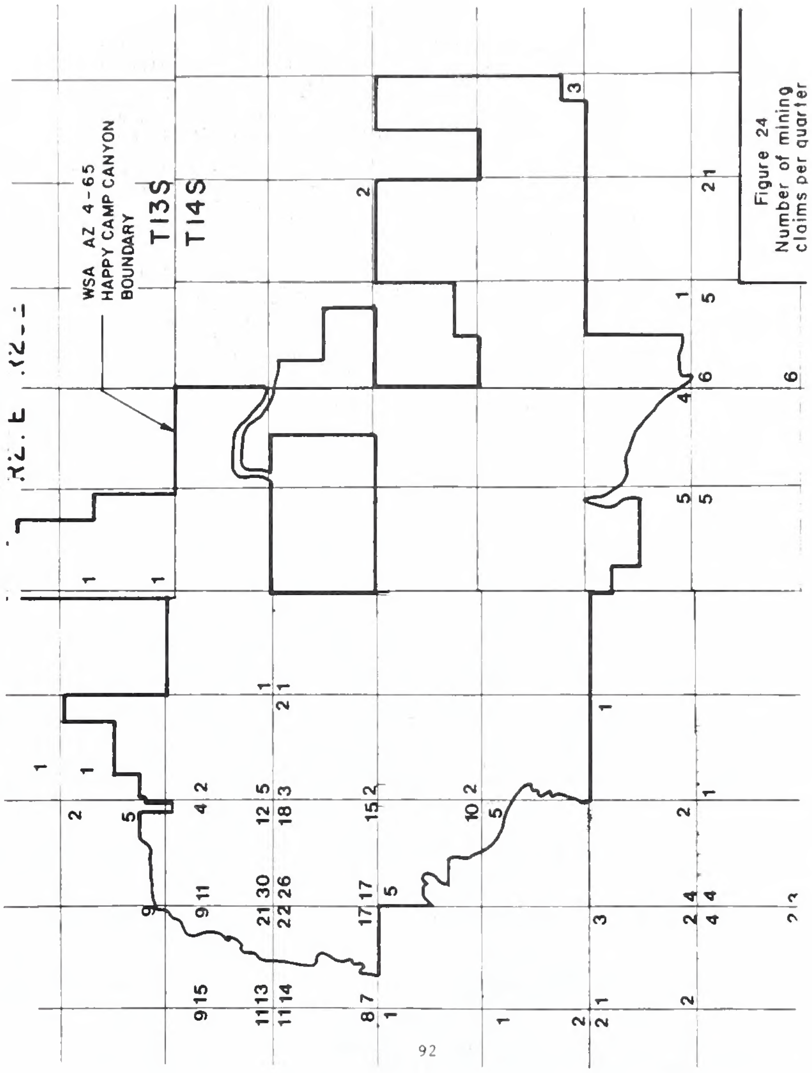

Figure 24
Number of mining claims per quarter

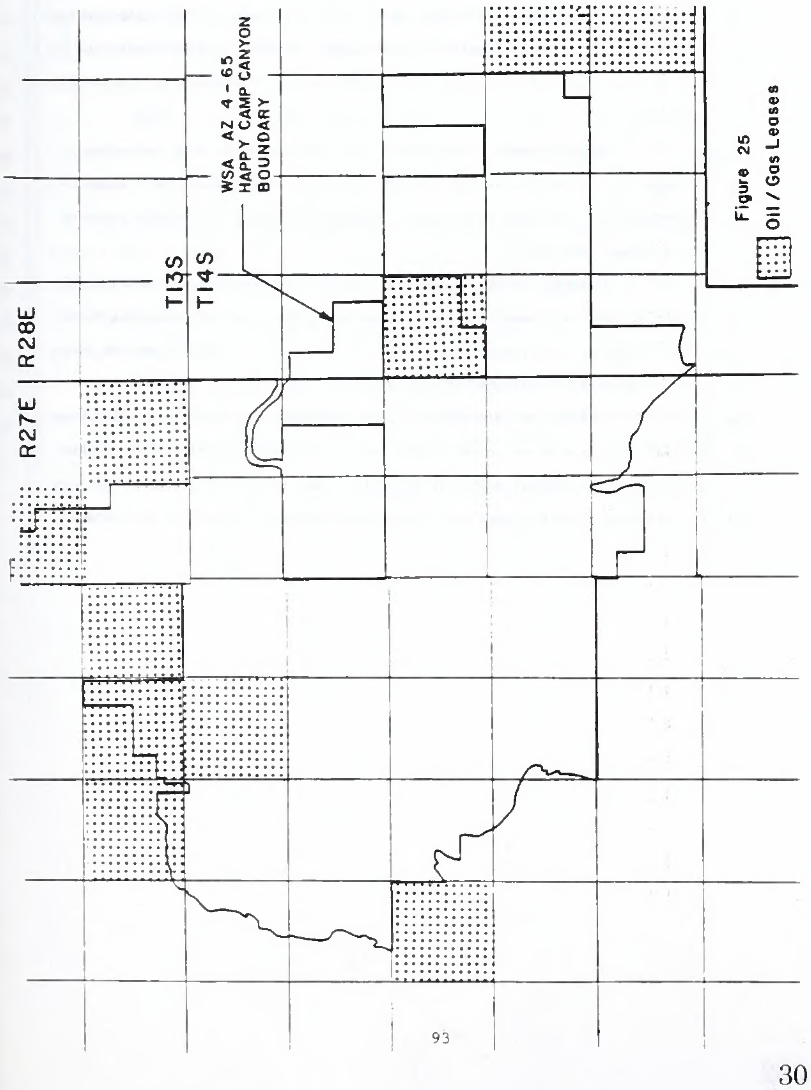

Figure 25

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Appendix A

Resolutions in support of deletion of the Gila Box WSA (4-22/23/24(A)) from further consideration in the BLM wilderness study program.

COUNTY OF GRAHAM
BOARD OF SUPERVISORS

RESOLUTION 1983-19

WHEREAS, the United States Department of the Interior Board of Land Appeals and Bureau of Land Management have recently caused a strip of land along the Gila and San Francisco Rivers (known as the San Francisco Subunit of the Gila Box Wilderness Study Area) to be included in a wilderness study area for wilderness consideration, and

WHEREAS, wilderness consideration and designation precludes the construction of water developments above and below the so-called San Francisco Subunit, effectively preventing any flood control or water storage measures in this area, either at the proposed development of the Camelsback Dam on the Gila River or Quail Spring flood control dam on the San Francisco River, and

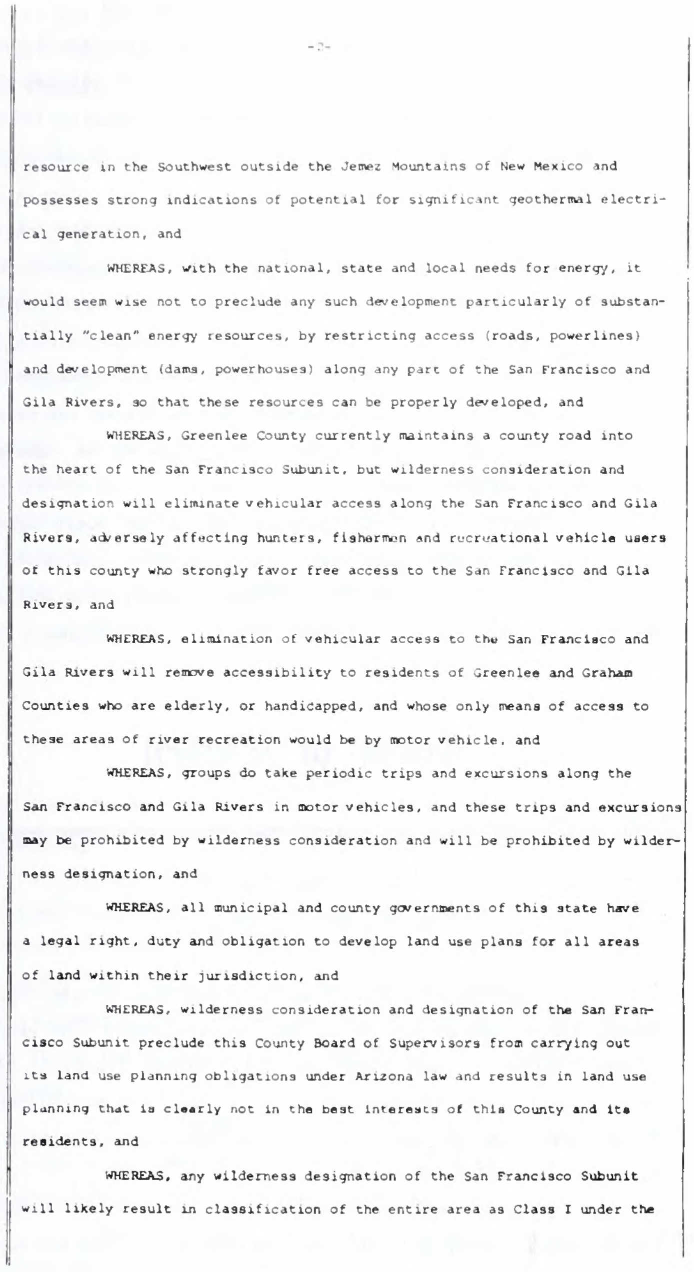
WHEREAS, a study by the Army Corps of Engineers, is now underway on the Gila River and its tributaries (including the San Francisco) upstream from the Camelsback site to determine feasible flood control measures to protect residents of Greenlee and Graham County, and

WHEREAS, wilderness consideration or designation of any part of the San Francisco River is highly premature at this point effectively precluding the study from being made and prohibiting any flood control structures on the San Francisco and Gila Rivers, which may be recommended by that study, and

WHEREAS, the Town of Clifton is highly vulnerable to extensive damage due to flooding waters, and has already suffered damage in floods in 1972 and 1978, and thus needs flood protection to protect lives and property in an urban area, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would prohibit any consideration of harnessing the river for potential hydroelectric power on the San Francisco River, which has one of the fastest drop ratios in this part of the country, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would hamper and block proper development of the geothermal resources within the Federal Geothermal Reservoir Area of the San Francisco Subunit at Gillard Hot Springs which produces the hottest water temperatures of any geothermal



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resource in the Southwest outside the Jemez Mountains of New Mexico and possesses strong indications of potential for significant geothermal electrical generation, and

WHEREAS, with the national, state and local needs for energy, it would seem wise not to preclude any such development particularly of substantially "clean" energy resources, by restricting access (roads, powerlines) and development (dams, powerhouses) along any part of the San Francisco and Gila Rivers, so that these resources can be properly developed, and

WHEREAS, Greenlee County currently maintains a county road into the heart of the San Francisco Subunit, but wilderness consideration and designation will eliminate vehicular access along the San Francisco and Gila Rivers, adversely affecting hunters, fishermen and recreational vehicle users of this county who strongly favor free access to the San Francisco and Gila Rivers, and

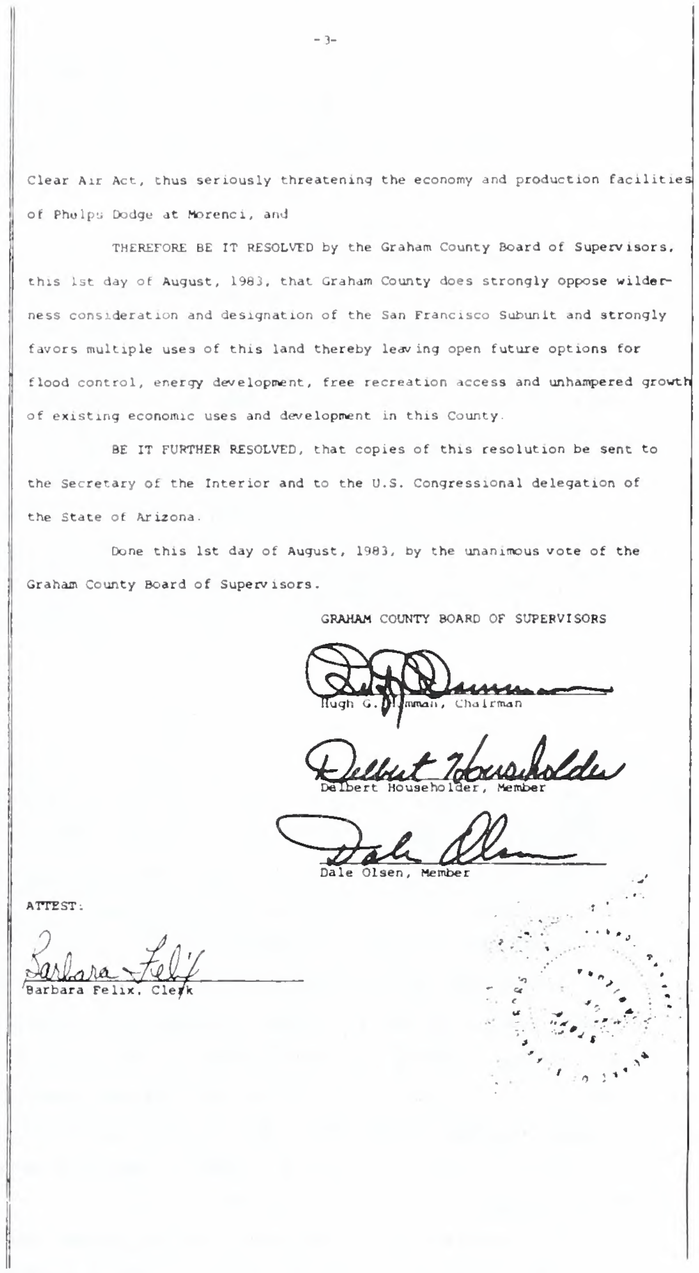
WHEREAS, elimination of vehicular access to the San Francisco and Gila Rivers will remove accessibility to residents of Greenlee and Graham Counties who are elderly, or handicapped, and whose only means of access to these areas of river recreation would be by motor vehicle, and

WHEREAS, groups do take periodic trips and excursions along the San Francisco and Gila Rivers in motor vehicles, and these trips and excursions may be prohibited by wilderness consideration and will be prohibited by wilderness designation, and

WHEREAS, all municipal and county governments of this state have a legal right, duty and obligation to develop land use plans for all areas of land within their jurisdiction, and

WHEREAS, wilderness consideration and designation of the San Francisco Subunit preclude this County Board of Supervisors from carrying out its land use planning obligations under Arizona law and results in land use planning that is clearly not in the best interests of this County and its residents, and

WHEREAS, any wilderness designation of the San Francisco Subunit will likely result in classification of the entire area as Class I under the



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Clear Air Act, thus seriously threatening the economy and production facilities of Phelps Dodge at Morenci, and

THEREFORE BE IT RESOLVED by the Graham County Board of Supervisors, this 1st day of August, 1983, that Graham County does strongly oppose wilderness consideration and designation of the San Francisco Subunit and strongly favors multiple uses of this land thereby leaving open future options for flood control, energy development, free recreation access and unhampered growth of existing economic uses and development in this County.

BE IT FURTHER RESOLVED, that copies of this resolution be sent to the Secretary of the Interior and to the U.S. Congressional delegation of the State of Arizona.

Done this 1st day of August, 1983, by the unanimous vote of the Graham County Board of Supervisors.

GRAHAM COUNTY BOARD OF SUPERVISORS

Hugh G. Dumman, Chairman

Delbert Householder

Delbert Householder, Member

Dale Olsen

Dale Olsen, Member

ATTEST:

Barbara Felix

Barbara Felix, Clerk

DAVID M. PERKINS,
County Administrator and Clerk
865-2072 865-3322

JACKIE D. COOPER, Morenci
ANGEL R. CUETO, Clifton
H.J. MILLER, Duncan

County of Greenlee

BOARD OF SUPERVISORS
P.O. BOX 908
CLIFTON, ARIZONA 85533

COUNTY OF GREENLEE

BOARD OF SUPERVISORS

RESOLUTION NO. 83-8-1

WHEREAS, the United States Department of the Interior Board of Land Appeals and Bureau of Land Management have recently caused a strip of land along the Gila and San Francisco Rivers (known as the San Francisco Subunit of the Gila Box Wilderness Study Area) to be included in a wilderness study area for wilderness consideration, and

WHEREAS, wilderness consideration and designation preculdes the construction of water developments above and below the so-called San Francisco Subunit, effectively preventing any flood control or water storage measures in this area, either at the proposed development of the Camelsback Dam on the Gila River or Quail Spring flood control dam on the San Francisco River, and

WHEREAS, a study by the Army Corps of Engineers, is now underway on the Gila River and its tributaries (including the San Francisco) upstream from the Camelsback site to determine feasible flood control measures to protect residents of Greenlee and Graham Counties, and

WHEREAS, wilderness consideration or designation of any part of the San Francisco River is highly premature at this point effectively precluding the study from being made and prohibiting any flood control structures on the San Francisco and Gila Rivers, which may be recommended by that study, and

WHEREAS, the Town of Clifton is highly vulnerable to extensive damage due to flooding waters, and has already suffered damage in floods in 1972 and 1978, and thus needs flood protection to protect lives and property in an urban area, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would prohibit any consideration of harnessing the river for potential hydroelectric power on the San Francisco River, which has one of the fastest drop ratios in this part of the country, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would hamper and block proper development of the geothermal resources within the Federal Geothermal Reservoir Area of the San Francisco Subunit at Gillard Hot Springs which produces the hottest water temperatures of any geothermal resource in the Southwest outside the Jemez Mountains of New Mexico and possesses strong indications of potential for significant geothermal electrical generation, and

WHEREAS, with the national, state and local needs for energy, it would seem wise not to preclude any such development particularly of substantially "clean" energy resources, by restricting access (roads, powerlines) and development (dams,

---

WHEREAS, any wilderness designation of the San Francisco Subunit will likely result in classification of the entire area as Class I under the Clear Air Act, thus seriously threatening the economy and production facilities of Phelps Dodge at Morenci, and

THEREFORE, BE IT RESOLVED by the Greenlee County Board of Supervisors, this 1st day of August 1983, that Greenlee County does strongly oppose wilderness consideration and designation of the San Francisco Subunit and strongly favors multiple uses of this land thereby leaving open future options for flood control, energy development, free recreation access and unhampered growth of existing economic uses and development in this County.

BE IT FURTHER RESOLVED, that copies of this resolution be sent to the Secretary of the Interior and to the U.S. Congressional delegation of the State of Arizona.

Done this 1st day of August 1983, by the unanimous vote of the Greenlee County Board of Supervisors.

GREENLEE COUNTY BOARD OF SUPERVISORS

CHAIRMAN

ATTEST:

David M. Perkins
ADMINISTRATOR/CLERK

APPROVED AS TO FORM:

GREENLEE COUNTY ATTORNEY

Town of Clifton

P.O. BOX 1415
PHONE (602) 865-4146
CLIFTON, ARIZONA 85533

CLIFTON TOWN COUNCIL

RESOLUTION NO. 7-83

WHEREAS, the United States Department of the Interior Board of Land Aopeals and Bureau of Land Management have recently caused a strip of land along the Gila and San Francisco Rivers (known as the San Francisco Subunit of the Gila Box Wilderness Study Area) to be included in a wilderness study area for wilderness consideration, and

WHEREAS, the so-called San Francisco Subunit is located within approximately four miles of the Town of Clifton and the San Francisco River runs through the Town of Clifton, and

WHEREAS, wilderness consideration and designation preculdes the construction of water developments above and below the San Francisco Subunit, effectively preventing any flood control or water storage measures in this area, either at the proposed development of the Camelsback Dam on the Gila River or Quail Spring flood control dam on the San Francisco River, and

WHEREAS, a study by the Army Corps of Engineers, is now underway on the Gila River and its tributaries (including the San Francisco) upstream from the Camelsback site to determine feasible flood control measures to protect residents of the Town of Clifton, and

WHEREAS, wilderness consideration or designation of any part of the San Francisco River is highly premature at this point effectively precluding the study from being made and prohibiting any flood control structures on the San Francisco and Gila Rivers, which may be recommended by that study, and

WHEREAS, the Town of Clifton is highly vulnerable to extensive damage due to flooding waters, and has already suffered damage in floods in 1972 and 1978, and thus needs flood protection to protect lives and property in an urban area, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would prohibit any consideration of harnessing the river for potential hydroelectric power on the San Francisco River, which has one of the fastest drop ratios in this part of the country, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would hamper and block proper development of the geothermal resources within the Federal Geothermal Reservoir Area of the San Francisco Subunit at Gillard Hot Springs which produces the hottest water temperatures of any geothermal resource in the Southwest outside the Jemez Mountains of New Mexico and possesses strong indications of potential for significant geothermal electrical generation, and

WHEREAS, with the national, state and local needs for energy, it would seem wise not to preclude any such development particularly of substantially "clean" energy resources, by restricting access (roads, powerlines) and development (dams, powerhouses) along any part of the San Francisco and Gila Rivers, so that these resources can be properly developed, and

WHEREAS, Greenlee County currently maintains a county

road into the heart of the San Francisco Subunit, but wilderness consideration and designation will eliminate vehicular access along the San Francisco and Gila Rivers, adversely affecting hunters, fisherman and recreational vehicle users of the Town of Clifton who strongly favor free access to the San Francisco and Gila Rivers, and

WHEREAS, elimination of vehicular access to the San Francisco and Gila Rivers will remove accessibility to residents of the Town of Clifton who are elderly, or handicapped, and whose only means of access to these areas of river recreation would be by motor vehicle, and

WHEREAS, groups do take periodic trips and excursions along the San Francisco and Gila Rivers in motor vehicles, and these trips and excursions may be prohibited by wilderness consideration and will be prohibited by wilderness designation, and

WHEREAS, all municipal and county governments of this state have a legal right, duty and obligation to develop land use plans for all areas of land within their jurisdiction, and

WHEREAS, wilderness consideration and designation of the San Francisco Subunit preclude this Town Council from carrying out its land use planning obligations under Arizona law and results in land use planning that is clearly not in the best interests of the Town of Clifton and its residents, and

WHEREAS, any wilderness designation of the San Francisco Subunit will likely result in classification of the entire area as Class I under the Clear Air Act, thus seriously threatening the

economy and production facilities of Phelps Dodge at Morenci, and

THEREFORE, BE IT RESOLVED by the Clifton Town Council, this 28th day of July, 1983, that this Council does strongly oppose wilderness consideration and designation of the San Francisco Subunit and strongly favors multiple uses of this land thereby leaving open future options for flood control, energy development, free recreation access and unhampered growth of existing economic uses and development in and around Clifton, Arizona.

BE IT FURTHER RESOLVED, that copies of this resolution be sent to the Secretary of the Interior and to the U.S. Congressional delegation of the State of Arizona.

Done this 28th day of July, 1983, by the unanimous vote of the Clifton Town Council.

CLIFTON TOWN COUNCIL

MAYOR OF THE TOWN OF CLIFTON

ATTEST:

Manuel A.
TOWN ADMINISTRATOR/CLERK

APPTROVED AS TO FORM:

TOWN ATTORNEY

UPPER GILA RIVER ASSOCIATION
UGRA
ARIZONA
NEW MEXICO
©
P.O. BOX 1448
SAFFORD, ARIZONA 85546

UPPER GILA RIVER ASSOCIATION
RESOLUTION

WHEREAS, the United States Department of the Interior Board of Land Appeals and Bureau of Land Management have recently caused a strip of land along the Gila and San Francisco Rivers (known as the San Francisco Subunit of the Gila Box Wilderness Study Area) to be included in a wilderness study area for wilderness consideration, and

WHEREAS, the Upper Gila River Association represents the interests of its members who own designated acreages of water from the Gila River and its tributaries (including the San francisco River), and

WHEREAS, the interest of the members of the Upper Gila River Association will be best effected by continued measures to construct water developments for flood control, irrigation and water storage purposes, and

WHEREAS, wilderness consideration and designation precludes the construction of water developments above and below the so-called San Francisco Subunit, effectively preventing any flood control of water storage measures in this area, either at the proposed development of the Camelsback Dam on the Gila River, or Quail Spring flood control dam on the San Francisco River, and

WHEREAS, a study by the Army Corps of Engineers, is now underway on the Gila River and its tributainers (including the San Francisco) upstream from the Camelsback site to determine feasible flood control measures to protect residents of Greenlee and Graham Counties, and

WHEREAS, wilderness consideration or designation of any part of the San Francisco River is highly premature at this point effectively precluding the study from being made and prohibiting any flood control structures on the San Francisco and Gila Rivers, which may be recommended by that study, and

WHEREAS, the Town of Clifton is highly vulnerable to extensive damage due to flooding waters, and has already suffered damage in floods in 1972 and 1978, and thus needs flood protection to protect lives and property in an urban area, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would prohibit any consideration of harnessing the river for potential hydroelectric power on the San Francisco River, which has one of the fastest drop ratios in this part of the country, and

WHEREAS, any designation of the San Francisco Subunit as wilderness would hamper and block proper development of the geothermal resources within the Federal Geothermal Reservoir

Area of the San Francisco Subunit at Gillard Hot Springs which produces the hottest water temperatures of any geothermal resource in the Southwest outside the Jemez Mountains of New Mexico and possesses strong indications of potential for significant geothermal electrical generation, and

WHEREAS, with the national, state and local needs for energy, it would seem wise not to preclude any such development particularly of substantially "clean" energy resources, by restricting access (roads, powerlines) and development (dams, powerhouses) along any part of the San Francisco and Gila Rivers, so that these resources can be properly developed, and

WHEREAS, groups do take periodic trips and excursions along the San Francisco and Gila Rivers in motor vehicles, and these trips and excursions may be prohibited by wilderness consideration and will be prohibited by wilderness designation, and

WHEREAS, wilderness consideration and designation of the San Francisco Subunit preclude this Association from carrying out its duties to maximize the availability and use of the water from the Gila and San Francisco Rivers for the benefit of its members, and

THEREFORE BE IT RESOLVED by the Upper Gila River

THEREFORE BE IT RESOLVED by the Upper Gila River Association this 22nd day of July, 1983, that the Upper Gila River Association does strongly oppose wilderness consideration and designation of the San Francisco Subunit and strongly favors multiple uses of this land thereby leaving open future options for flood control, energy development, free recreation access and unhampered growth of existing economic uses and development of the Gila and San Francisco Rivers.

BE IT FURTHER RESOLVED, that copies of this Resolution be sent to the Secretary of the Interior and to the U.S. Congressional delegation of the State of Arizona.

Done this 22nd day of July, 1983, by the unanimous vote of the Upper Gila River Association.

UPPER GILA RIVER ASSOCIATION

By Kenyon Udall
Chairman Kenyon Udall

ATTEST:
Wilford R Richardson
Secretary Wilford R. Richardson

RESPONSE — LETTER 97

97-1 Figures 1-5 and 11 included in this comment have not been reproduced in this document. They are available for inspection at the Safford District Office.

97-2 The U.S. District Court for the Eastern District of California issued a decision on April 18, 1985, in *Sierra Club v. Watt*, concerning certain lands that were deleted from wilderness review in 1982 and 1983. The decision restores split-estate lands to wilderness study under Section 603 of FLPMA.

97-3 The district has properly followed BLM policy with respect to the GEM assessment procedure, and also has made a significant effort to evaluate the mineral resources of the WSAs and what effect wilderness management would have on the use of those resources. While the Wilderness Study Policy (BLM 1982c) requires the use of the established GEM assessment procedures, further policy direction in instruction memoranda from the Washington Office states:

> This procedure will be utilized in each wilderness study effort except in those instances in which either the wilderness study schedule will not permit their incorporation or in which District Managers believe additional minerals information is not needed for the development of wilderness suitability/nonsuitability recommendations.

Since the Bureau GEM assessment schedule did not accommodate this District's study schedule, the District GEM inventory was conducted by the Arizona Bureau of Geology and Mineral Technology (ABGMT).

The List of Preparers identifies the district mining engineer responsible for the minerals and energy portions of the document. While ABGMT conducted the mineral inventory, this district's mining engineer conducted the mineral resource evaluation, spending many hours in consultation with industry, ABGMT and other professionals in the field. ABGMT has been added to the list of preparers as a consultant.

The district feels adequate consideration was given to mineral resource data and the EIS does meet the standards required by NEPA and BLM GEM assessment procedures.

97-4 The EIS is in compliance with Section 1502.16(c) of the Council on Environmental Quality (CEQ) regulations. Chapter V, Coordination and Consultation, addresses this requirement. However, Chapter V does not address each individual policy of the BLM. The CEQ regulations (40 CFR, 1592,16(c)), BLM planning regulations (43 CFR 1601.3-4), and the Wilderness Study Policy (BLM 1982c) all require BLM to consider and document the extent to which our recommendations are consistent with resource-related plans and policies of other federal agencies, state agencies, local governments and Indian tribes. This has been done.

BLM's mission to manage the multiple uses of the public lands is guided by many laws, regulations and policies. When examined individually, this guidance can be inconsistent and contradictory. However, in consideration of our overall mission, all these laws, regulations and policies provide a total management authority.

97-5 The district has not assessed the cumulative impacts of wilderness management on the mineral resource on a statewide basis. The scope of this analysis was not statewide. However, Chapter IV assessed the impacts WSA-by-WSA and Table 2-3, Summary of Impacts, not only shows the comparison by WSA and alternative, but can be used to determine the cumulative impact within the analysis area.

97-6 BLM policy requires mineral surveys to be conducted on those WSAs preliminarily recommended suitable by BLM field offices. The State Directors will then have the information available for their consideration before forwarding their recommendations. Mineral surveys are not required for WSAs recommended nonsuitable. The results of the mineral surveys could change the suitable recommendations in this document.

97-7 BLM regulations do control mineral and energy activities to a standard which prevents unnecessary and undue degradation of the environment. While this standard provides protection to the total environment, it may not prevent impairment of wilderness values. For example, road construction may occur in an environmentally acceptable manner but, since roads are not permitted in wilderness areas, the wilderness resource is adversely impacted.

97-8 Wilderness designation would have a significant adverse impact on mineral and energy exploration and development, assuming minerals and energy exist in each WSA that would be explored and developed. The draft EIS concluded that wilderness designation would have a significant adverse impact on mineral exploration under all alternatives except *No Wilderness* because available data suggested the WSAs were exploration targets and exploration was expected if the WSAs were not wilderness. It was also concluded that *All Wilderness* would probably have an adverse impact on mineral or energy development because somewhere within one or more of the WSAs there was probably a developable resource. However, there was no certainty that a resource would be developed. Under all other alternatives the known energy resources would not be designated wilderness. Therefore it was concluded that these alternatives could possibly have an adverse impact on energy exploration and development.

In the final EIS, the assessment is modified slightly and concludes that mineral exploration would be significantly impacted under all alternatives except *No Wilderness*, but that energy exploration is not likely at this time. In a general sense, assuming mineral and energy resources are present, BLM agrees with your comment. However, based upon present information about the resources specific to this EIS area, there is no reason to change the assessment.

97-9 The statements on pages 18 and 65 are based upon Assumptions 8 and 9 on pages 2 and 55 of the draft EIS. The district believes these assumptions are reasonable and correct as they are based on existing law and policy. According to existing law (Wilderness Act of 1964), all designated wilderness was closed to appropriation under the mining and mineral leasing laws as of midnight, December 31, 1983. Because no areas discussed in this EIS were designated prior to the cut-off date, they will be immediately closed. This closure is subject to change by Congress.

97-10 See text, Chapter 1.

97-11 The Wilderness Management Policy (See Appendix No. 2) states that BLM will manage air quality in designated wilderness areas as Class II unless they are reclassified by the state as a result of the procedures prescribed in the Clean Air Act. As with any law, regulation or policy, they are always subject to change. We recognize that entities other than BLM could cause reclassification of air quality standards. However, our analysis is based upon existing laws and policy, not potential changes in those laws and policy. See text, Chapter 4, on impacts to air quality.

97-12 The EIS points out the primary employment stimulus in Greenlee County is mineral based, including both mining and manufacturing. The EIS further acknowledges the three-county area's (including Greenlee County) economic dependency on mining. The employer was not named but it is the Phelps Dodge Corporation. The distance from the WSA to the Southwest Tailings Dam System was not given, but the presence of the entire Phelps Dodge operation north and east of the WSAs and its effect on the wilderness quality of the WSAs was identified. The EIS does identify the nonattainment area around the Morenci copper smelter and the air quality management classes over the Gila Box and Turtle Mountain WSAs. And finally, the EIS did not specifically state wilderness designation would inhibit further expansion of the Morenci operation because the analysis could not draw that conclusion. Wilderness could inhibit expansion of the mine and operation but present data do not indicate that it will. The EIS did address impacts to minerals and energy in the two WSAs.

97-13 The district believes its assessment of regional economic impacts to the mineral industry is correct and the discussion beginning on page 77 of the draft EIS supports that conclusion. The conclusion you referred to on page 80 addresses the local economic impacts of wilderness management on ORV use in the Gila Box WSA, not regional economic impacts of wilderness management on the mineral industry in the entire EIS area (all nine WSAs). The two conclusions are not related.

97-14 The management objectives of Visual Resource Management (VRM) Class I are explained in the EIS (Chapter 3). The constraints of these objectives apply only to BLM-administered public lands, not private lands. This classification would have no adverse impact on the Morenci operations. In fact, the Gila and San Francisco River Canyons have been managed as VRM Class I areas for many years. If the Gila Box and Turtle Mountain WSAs were to become wilderness, the issue would be how the two areas would be adversely affected by the tailings facilities 330 yards away, not how the Morenci operation would be affected by the wilderness. The property 330 yards away is private land belonging to Phelps Dodge. The primary issue would probably be air quality, but BLM would continue to manage the Gila Box and Turtle Mountain under their present air quality Class II and nonattainment classifications. Changes in air quality classes would not be recommended by BLM. That is the function of the State of Arizona. Expansion of the Morenci operation into the WSA was not specifically addressed in the EIS as present information does not indicate Phelps Dodge's desire to expand into the WSA. The environmental consequences of wilderness management on mining and mineral leasing in the two WSAs were properly addressed and this assessment would apply to an expansion of the Morenci operation.

97-15 The economic impacts of wilderness management on the mineral industry will never be known. Even if the mineral resources underlying the two WSAs was totally understood, changes in the economy and improvements in technology would always present a new economic picture. So, instead, BLM studies the effects of wilderness management on mineral development with the best available data. Further, the law requires U.S. Geological Survey and Bureau of Mines to survey the areas preliminarily recommended suitable and their studies will aid in the decision-making process. For additional information, see Response 30-2.

97-16 Careful consideration was given to the mineral potential in the area of overlap between the copper zone and the WSAs in this EIS.

97-17 The BLM feels the EIS reflects the mineral potential of the WSAs, based upon available information. In fact, the data provided in the Arizona Mining Association report closely parallel the data provided in the EIS.

97-18 The reason for the nonwilderness recommendation did not include conflicts with the potential Camelsback Dam. Response 4-1 provides the rationale behind the relevance of this data in the decisionmaking process. The geothermal energy potential at Gillard Hot Springs was, however, a factor in our decision not to recommend wilderness for the Gila Box. It should have been included in the reasons listed in the draft EIS. Designation of the Gila Box as wilderness would restrict only vehicular access, not all access. Restricted vehicle access is a conflict between wilderness management and ORV use discussed in the EIS.

97-19 The EIS does not mention the district's evaluation of the naturalness of the San Francisco sub-unit, as published in the wilderness inventory decision report of November 14, 1980, or the findings of the *Notice of Final Decision* to Nicholas Van Pelt because those findings were appealed to the Interior Board of Land Appeals. In that appeal the BLM's decision was remanded and it was instructed to include, essentially, the river canyons, because the entire sub-unit was not significantly impacted by the outside sights and sounds of the Phelps Dodge operation at Morenci.

97-20 The EIS does properly identify the proximity of the Phelps Dodge mining operation. The Wilderness Values section of Chapter 3 for the Gila Box WSA discusses the existence of the facility and the impact it has on the wilderness values of the WSA. It doesn't address the growing tailings dams because the purpose of this section is to address the existing wilderness values of the WSA — not future impacts. The BLM knows that, as the tailings dams grow, their effect on the wilderness values may also increase.

98

State of Arizona
Bureau of Geology and Mineral Technology
Office of the Director
University of Arizona
Tucson, Arizona 85721
(602)626-1943

26 August 1983

Mr. Lester K. Rosenkrance
United States Dept. of the Interior
Bureau of Land Management
Safford District
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

We have received the Draft Environmental Impact Statement (EIS) covering the proposed wilderness program for the Safford District wilderness EIS area and have several comments. These comments, on the four areas in which wilderness description is proposed, are based entirely on our analysis of the geologic setting relative to the potential for mineral resources.

Needles Eye. We concur with the appraisal in the EIS (p.111) that this area "has good exploration potential" because of numerous mines and mineral occurrences in the adjacent area and a similar geologic setting within the Wilderness Study Area (WSA). The possibility of mineralization associated with a Laramide-aged igneous intrusive body beneath the surface cannot be ruled out.

Black Rock. Fluorspar has been mined from within this WSA and copper mineralization is present just outside. The copper mineralization is associated with a batholith that is exposed at the surface. That same batholith is probably present in the subsurface, beneath the Pinal Schist, in the western portion of the WSA, as correctly stated in the EIS (p.112). If so, the western portion of the WSA has potential for mineral resources.

Fishooks. Millions of years after the mineral deposits were formed in the general area of the Fishooks and Day Mine WSA's, they were covered by volcanic materials. These volcanics were faulted and eroded and now form the Gila Mountains. The underlying rocks that have known mineral deposits north of Safford and at Morenci are not exposed at the surface in the Fishooks WSA. Therefore, one does not know whether any mineral deposits are present beneath the Fishooks WSA or the Day Mine WSA. One would have to conclude, however, that there is potential for mineral deposits beneath both of those WSA's, because the geology is similar to that in adjoint areas which have known deposits. The geologic summary within the EIS (p.112) contains the same assessment of potential.

A Division of the
University of Arizona

Mr. Rosenkrance
26 August 1983
Page 2

Happy Camp Canyon. The assessment of mineral potentials in this WSA is accurately expressed in the EIS (p.115). We would like to emphasize a statement made in that summary: "while most of the known mineralization occurs just to the south and west of the WSA, this does not preclude mineralization in the interior of the WSA." Even though the northwestern and southwestern portions of the WSA have not been included, the remainder, which has been proposed for wilderness designation, also has mineral potential.

98-1 On the basis of the geologic setting and presence of mines or mineral occurrences, either within or nearby, each of the four areas proposed to be designated as wilderness has distinct mineral resource potential. Before a final decision is made, we recommend that considerably more attention be given to evaluating the mineral potential.

Thank you for the opportunity to comment on this EIS.

Sincerely,

William P. Cosart
Acting Director

WPC/ra

RESPONSE — LETTER 98

98-1 More intensive inventory of mineral resources is required for those WSAs recommended for wilderness status. See Response 30-2.

99

Allen T. Cooper
Mining Engineer, Geologist
5712 West Louisiana
Tucson, Arizona 85746
August 26, 1983

District Manager
Bureau of Land Management
425 East Fourth Street
Safford, Arizona 85546

Dear Sir:

I would like to present my ideas and comments for the record against possible consideration for inclusion of the Gila Box (AZ-4-22/23/24-A) and Turtle Mountain (AZ-4-22/23/24-B) areas as wilderness.

My most important argument against inclusion of these areas is based upon the fact that it is in the heart of a large mineralized area, namely the intersection of two broad structural bands called the Texas Orogen and the Wasatch-Jerome Orogen. I am attaching a map which was reprinted from Geology of the Porphyry Copper Deposits, Southwestern North America, Titley and Hicks, The University of Arizona Press, Tucson, Arizona. As you will notice from the map, the Safford-Globe-Morenci area is centralized at the intersection of a northwesterly trending structural control (Texas structural zone) and a NNW-N trending structural zone (Wasatch-Jerome Orogen). Major metallic ore deposits in the immediate area are the Morenci Copper Deposit (Phelps Dodge Corp.) to the north and the Kennecott and Phelps Dodge (undeveloped) deposits in the Lone Star Mining District to the west. The Morenci deposit is north of the WSA and Lone Star Mining District being due west of the WSA.

The wilderness study area appears to be overlain by a sequence of volcanic rocks. The fact that a copper oxidized monzonite porphyry exists in a 1,500'deep drill hole (mentioned in your Draft Environmental Impact Statement, P. 113), beneath the volcanics, brings up the possibility of a significant copper-molybdenum deposit overlain by volcanics elsewhere in the Gila Box-Turtle Mountain areas. Your impact statement indicated a copper value of 0.2 percent! Most exploration geologists would consider this much more than "background" copper. I believe that an anomoly would be a more appropriate term. Perhaps, someday in the future when many of the major copper producers have played out and the price of copper at a reasonable level, this area may look very attractive.

99-1 A final point I might mention is that you did not consider rockhounding potential in this region. To the southeast of this area, Fire Agate is collected and fashioned into gemstones and to the east of Clifton, some very beaufitul, Purple Banded Agates occur. Commercial deposits of agate are possible

Page 1 of 2

District Manager
Bureau of Land Management
Safford, Arizona
August 26, 1983
Page 2 of 2

99-1 within the WSA.

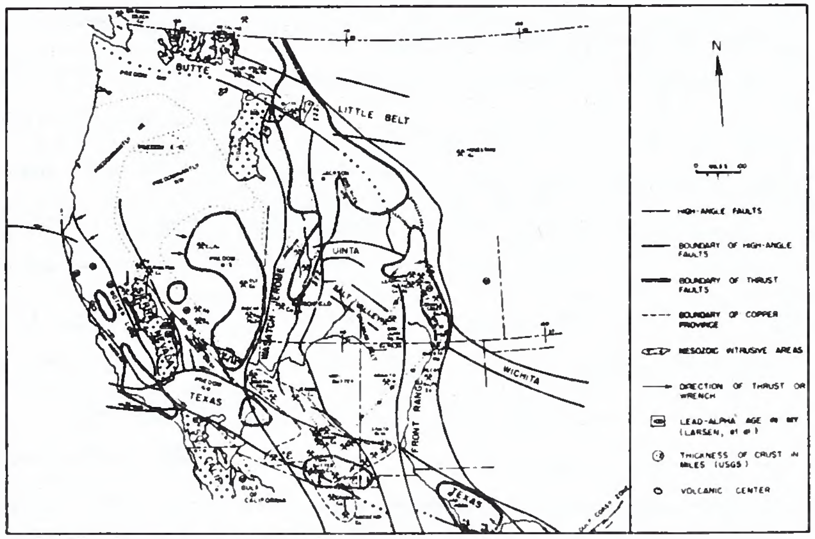
I would like to thank you for your time and consideration.

Sincerely yours,

Allen T. Cooper

Allen T. Cooper
Mining Engineer, Geologist

ATC/klm
Attach.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0 MILES 100
HIGH-ANGLE FAULTS
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BOUNDARY OF THRUST FAULTS
BOUNDARY OF COPPER PROVINCE
MESOZOIC INTRUSIVE AREAS
DIRECTION OF THRUST OR WRENCH
LEAD-ALPHA AGE IN MY (LARSEN, et al)
THICKNESS OF CRUST IN MILES (USGS)
VOLCANIC CENTER
BUTTE
LITTLE BELT
UINTA
WASATCH
JEROME
SALT VALLEY
FRONT RANGE
WICHITA
TEXAS
NEVADA
GULF OF CALIFORNIA
TEXAS

FIGURE 2.—Major structure and ore deposits of the western Cordillera.

RESPONSE — LETTER 99

99-1 The fire agate resource southeast of the WSAs is used by recreationists for hobby collecting. This could continue in designated wilderness so long as it did not degrade the wilderness values. Commercial development would not be allowed unless fire agate were considered a locatable mineral. Present information does not indicate potential for fire agate or purple banded agate in the WSAs.

100

Arizonans for Wild and Scenic Rivers
Box 114
Cortaro, AZ 85230
August 25, 1983

Mr. Lester Rosenkrance, District manager
Bureau of Land Management, Safford District
425 E. 4th st.
Safford, AZ 85546

Dear Mr. Rosenkrance:

Please enter this letter as part of the offical comments on the Wilderness Study Area (WSA) Draft Environmental Impact Statement (DEIS)

Our organization has been interested in your District for the past seven years. Originally we sought placement in the national Wild and Scenic River System of the portions of both the Gila and San Francisco Rivers that are contained in the Gila Box 17,831 acre WSA. After considerable field research and research of available scientific studies, we believe these two river segments should receive wilderness designation due, in part, to their high wilderness quality. We therefore fully support a 17,831 acre Gila Box Wilderness.

100-1 As you are aware, there are no river segments in Arizona in either the Wild and Scenic River System or the Wilderness System nor are any bills in Congress that would grant such status. Our position is that this WSA is unique in many areas. The wildlife is diverse. I have seen river otters in the Gila Box on three different occassions in 1982. This was verified by additional people on the trips and listed by Heritage. However, you fail to list the river otter as a species found. This is an error we feel should be corrected.

Of the 18 species you have listed on page 44 of the DEIS as threatened, endangered, or sensitive you state the Gila Box has 13 species verified. The maximum verified species any of your other 8 WSA's have is 6. This speaks for the tremendous wildlife habitat of the Gila Box.

100-2 We support your planting broadleaf riparian trees along the San Francisco and Gila Rivers. However, we suggest you ask for assistance from volunteers from groups such as environmental organizations, horseback-riders, backpackers, and river floaters. Your plan to use only ORV volunteers is one-sided and prejudiced. We suggest you broaden your view to obtain volunteers.

The educational value of the Gila Box 17,831 acre WSA is unparalled in Arizona. Students can backpack, hike, and float the WSA and experience the area's qualities. Of particular interest in educating students is the presence of diverse qualities in the WSA. These include but are not limited to: geological drama, historic sites, cultural sites, presence of threatened, endangered and sensitive wildlife such as the black hawk and peregrine falcon, transition zone of both Sonoran and Chihuahuan deserts, and riparian plant and animal species. Opportunities abound to teach the action of the water, to teach current flows, how the water has carved, the meaning of waves and holes, the ecology of side canyons as opposed to the stream bed. These and many other areas of learning unique to a desert free-flowing river are very special qualities of the Gila Box, qualities of learning and experiencing that cannot be found elsewhere in Arizona. Your DEIS has completly ignored these special, unique learning opportunities

available in the Gila Box WSA. While it is true that each of your 9 WSA's could have one or two unique learning opportunities, the Gila Box WSA stands alone. It exemplifies a maximum situation of learning about and experiencing a wilderness desert river with all the attendent resources such as Salado archaeological sites, rugged mountain geology, and inviting side canyons.

The Tonto National Forest reported that only .003 % of Arizona is considered riparian (DEIS, Salt River-Lower-Recreational River Study). Our research shows that of this, only about 15-20 % is considered in a natural state. This makes the Gila Box precious.

We will not support any administrative designation for the Gila Box in place of Wilderness designation. District and State Directors come and go, local and state policies change. Thus, we must insist on federal legislation placing the 17,831 acre Gila Box into the Wilderness System.

We thank you for having the opportunity to comment and look forward to your final EIS.

Sincerely,

Thoron Lane

THORON LANE
Chairman

RESPONSE — LETTER 100

100-1 See Response 95-1.

100-2 Since the beginning of tree planting in the Gila Box, BLM has used hikers, horseback riders and ORV drivers to assist them in maintenance of the plantings.

101

Box 87
Cortaro, AZ 85230
August 23, 1983

Mr. Lester Rosenkrance, District Manager
Safford District, Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

Please enter this letter as part of your official testimony on the District's Draft Environmental Impact Statment (DEIS) of proposed wilderness areas.

This letter will cover only one of your areas, the Gila Box. I am intimately familiar with the Gila Box and have spent over 60 days rafting, backpacking, hiking, and doing field studies in the area since 1976. I am an avid self-propelled wilderness explorer and have explored many roadless areas in the United States in the past 10 years.

I do not support your recommendation for no wilderness for the Gila Box. Instead, I support a wilderness of 17,831 acres for the Gila Box. Most of my reasoning comes from my experience with and in the area.

As a veteran river rafter I would first like to address that issue. I have rafted, private party style, the Grand Canyon, Salt, San Juan, and many sections of the Green River in Utah. One of the most outstanding characteristics of the Gila Box is that it is floatable by many types of craft such as cheap rafts (under $100), canoes, inflatable canoes, kayaks and inner tubes. This spring I saw one party with about 5 large truck tire inner tubes tied togather. They roped a platform on top, and poled their way down the canyon, fishing and singing as they went. Many times I have pointed out to you and your staff that this river floating is unique in that one does not have to be experienced in whitewater techniques or have expensive equipment like one would need for river sections like the Grand
Canyon. Yet your DEIS makes no mention that this form of river
101-1 floating, that is, a peaceful, relatively rapidless stretch, is not
available any place else in the southern half of the state. The only

101-1 other wilderness, quiet, calm stretch which exists in Arizona for
floating is a stretch on the Salt River above highway 288 crossing.
However, this often takes a 4-wheel drive vehicle to get in whereas
the Gila Box run does not.

In the past several years I have taken a number of people rafting down the Gila Box. Fourth graders, seventh graders, people in their seventies, even handicaped people were able to raft and enjoy the area. If I wanted to canoe or raft a calm stretch of river in a wilderness setting in March or April I would have to travel as far as Utah because I do not own or have access to a 4-wheel drive. The Gila Box, therefore, is very valuable to me for it provides me a unique opportunity to drift and float in my craft.

So, what does all this unique floating have to do with your non-wilderness proposed action? Simply that if it was placed in the wilderness system the water flows would be maintained, there would be no dams within the area and all of us who love to float the area would continue to be able to do so.

Your recreational use studies of the Gila Box leave much to be
desired. The fact is, and this has been readily admitted by your
staff, you really don't know the recreational use. And, you have
not calculated the amount of funds recreational use brings to the
area except for the amount you say ORVs spend. I suggest you go
back to the drawing board and do a bit better figuring. I under-
101-2 stand from your staff that the $75,000 figure you list as being
attributed to ORV use was obtained from a Safford sand rail en-
thusiast, Tony Goodman, who also gave you the estimated 5,000
annual recreation visitor days for ORV use in the Gila Box. I
do not believe a federal document should report figures obtained
from individuals. It is your responsibility to report the facts,
not figures given by citizens. Do studies, find out the facts,
then report accurate facts. I challenge the figures and expect
the final EIS to show a more correct understanding of recreational use.

In my conversations with you and your staff there has been a constant referral to the fact that ORV use does not conflict with river floating use. My objection to ORV use is due to a number of reasons and has little to do with rafting/floating during the high water season.

101-3 Just what are the long-range, cumulative effects of continued ORV use in the Gila Box? You did not address that in your document and I would like to see the final EIS do that. What happens to the water quality when a group goes up or down the river? What happens in the low water season when an ORV breaks an oil pan or has a gas line or gas tank leak? What happens if the engine breaks down? What happens to the beaver population? What happens to the razorback sucker, a state-listed threatened species which was recently reintroduced into the Gila River? Since we do have low river flow years, it is possible for ORVs to penetrate the area at the critical Black Hawk nesting time. What happens when they roar by a nest? What happens to the solitude of the hikers and backpackers who use the area in the low water season? These are important questions which you have not answered. I suggest that you will find that ORV use has a significantly adverse impact on water quality, wilderness recreational use, and wildlife and plant species.

Of the 1,316,539 acres in your district you are proposing only 2.6% (34,881 acres) for wilderness. This leaves 97.4% of the area open to ORV use. The 17,831 acre Gila Box Wilderness Study area is only 1.3% of your total district. By adding to the other areas you are recommending for wilderness, the ORVs would still have access to 96.1% of the district. You even state in the DEIS that they would probably go elsewhere if the area were wilderness. There are other river areas available such as the San Francisco above Clifton, and the Gila below Safford.

101-4 I find no detailed discussions of the significant issue listed on page 1: Would an area add to the diversity of the National Wilderness Preservation System? Nowhere do you discuss the presence of both Sonoran and Chihuahuan Deserts, both plant and animal communites are present in the Gila Box from both these deserts. This has been documented by Minckley under contract by you. This is a serious omission and should be corrected. You do not discuss this in reference to the listed issue on page one.

The Gila Box has been a little gem for me. The countless nights spent within her canyon walls has brought peace and joy, has been an escape from the cities I must have. I have never failed to be recharged, coming home ready to tackle work again.

The Gila Box is easily lost when comparing it with the Grand Canyon or Canyonlands. But it is as important an area to me. For on a moments notice I can strap my back on and backpack in the summer or fall. I can raft without having to wait years for my permit. I can experience it on my terms, without crowds. Words can't describe the joy of having a black hawk swoop down over my head, of seeing my first peregrine falcon in the Box, of observing beaver sunning on a beach, of listening to the birds sing as I backpack by their perch.

The issues are complex and not easily listed or answered. The Gila Box is a wilderness area. On page 29 you state."The area's running water, rugged and colorful terrain, highly eroded geologic formations, and diversity of plants and animals produce outstanding scenery." Even such words ring pale when comparison with my inner feelings of the area. It is unique. It is peaceful. It is rugged and colorful. It is many things. Most of all, it is a wild place and it deserves it place in the wilderness system.

Sincerely,

Thor Lane

Thoron "Thor" Lane

RESPONSE — LETTER 101

101-1 The EIS identifies the outstanding opportunity for seasonal float-boating and canoeing. It further states the natural qualities of the Gila Box have made it increasingly popular for floatboating. The degree of difficulty was not assessed because what is important is that the opportunity exists and contributes to the wilderness values of the WSA.

101-2 The ORV use figures in the final EIS were revised to reflect a more accurate number of people who drive or ride ORVs into the WSA. The amount of use was determined through interviews with local ORV users and professional estimates of BLM personnel. As ORV use is a significant issue in determining wilderness suitability, knowledge of the amount of use was necessary. For the purpose of the analysis, BLM considers the revised figure to be a reasonable estimate of use. The 1,000 recreation visitor days (RVD) were calculated as follows:

(Season length: June-Sept.)	X	(Number of vehicles/ week)	X	(Number of people/ vehicle)	X	(Duration of stay)	=	Visitor Use
16 weeks	X	20 vehicles/ week	X	3 people/ vehicle	X	10 hours or 1 RVD	=	960 RVDs (1,000 RVDs)

The economic impacts associated with ORV use resulting from wilderness designation are directly tied to the number of recreation visitor days foregone by wilderness designation. An estimated value of $15 per RVD was used in this calculation. However, our analysis concludes the economic impacts of wilderness might have a slight adverse impact to the local economy. If under a wilderness alternative the ORV use shifted to other nearby areas, the expenditures of $15 per RVD may remain in the local economy, further reducing the impact to the local economy. Increases in primitive recreation use (hiking, floating, etc.) will also generate income to the local economy. All these factors were considered in the conclusion that wilderness would not have significant impacts on revenue generated by recreation in the two counties. (See Chapter 4, Impacts to Economic Conditions.)

101-3 See Response 1-2.

101-4 See Response 15-2.

102

NATIONAL PUBLIC LANDS TASK FORCE
NEVADA OUTDOOR RECREATION ASSOCIATION, INC.

Box 1245
Carson City, Nevada 89701
August 24, 1983

Mr. Lester Rosenkrance, District Manager
Bureau of Land Management
Safford District
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

Please enter these comments as part of the official comments on your Draft Environmental Impact Statment (DEIS) of your Wilderness Study Areas.

We wish to go on record supporting full wilderness for the following areas in your district:

Needles's Eye	9,485 acres
Black Rock	8,492 acres
Fishhooks	15,013 acres
Day Mine	16,629 acres
Gila Box	17,831 acres
Turtle Mountain	17,422 acres
Javelina Peak	17,870 acres
Peloncillo Mtns.	12,317 acres
Happy Camp Canyon	16,761 acres

The total amount of acres we support for wilderness designation, 131,820, amounts to 10% of the 1,316,539 acres in the Safford District and would leave 90% of the land under multiple use management and open to Off Road Vehicle (ORV) use. We do not consider our support for this to be extravagant. On the contrary, we feel it to be a balanced proposal calling for sane land and sane resource management in your district.

Our organization has long felt you are and have been in a precarious position with regard to management of your area. With constant local pressure from local interests and with no federal legislation to protect the unique areas in your district, the nine Wilderness Study Areas we listed as supporting, we clearly can see your bending and yielding to the pressures.

For this reason we will never support local or state management nor will we support administrative protection plans that would preclude one of the Wilderness Study Areas (WSA) from being designated as a wilderness. We would, however, support an area for wilderness and one of your options such as Outstanding Natural Area/s. At no time will we ever drop our support for wilderness for the 9 areas we have listed in favor of only one of your options listed on page 82 of the DEIS. Such options are a poor carrot when compared to the protection afforded by placement in the Wilderness Preservation System.

Gila Box: Our support for a full 17,831 acre Gila Box Wilderness is a matter of public record. We find your reason to propose no wilderness "because of conflicts with ORV use in the canyon bottoms" to be absurd. 102-1 We can't find any discussion of the long-range, long-term effects of ORV use in the DEIS. You fail to discuss what effects ORVs in the area have or will have. Throughout your DEIS you discuss all the merits of the area such as the wildlife, the historic and cultural values, then you ignore them all when you propose no wilderness.

102-2 At no place in your document do you discuss the unique transition zone between the Sonoran and Chihuahuan deserts which are both represented by plant and animal species. Your document uses the Bailey-Kuchler vegetation classification system and ignores Dr. Minckley's unique ecosystems discussion. We want to remind you that Dr. Minckley was contracted by you for studies of the Gila Box. We find it strange you would spend money and then leave out some important information he obtained in those studies. This transition zone between the two deserts is cause alone to give the area wilderness protection.

102-3 Your figures of $75,000/year spent by ORVs and 5,000 annual recreation visitor days for ORV use are a guess. We understand they were provided by Tony Goodman, a Safford sand rail enthusiast. We oppose such figures; we don't believe them and we don't think they are proper to insert in a federal document unless it is noted where the figures were obtained.

102-4 We do support your plans for planting trees in the area. However, we feel you are prejudiced in calling for using ORVs to help keep costs down. You did not contact any other groups but them. You did

not contact rafters, backpackers, members of horseback riding clubs, environmental groups, wildlife groups, or schools to see if they would be interested in assisting. We consider this approach to be tunnel vision. You, then, promote exactly what you want to promote, that is, ORV use. We can think of numerous groups and individuals including our organization who would be happy to assist without using ORVs. This leads any thinking individual to the obvious conclusion that your statements on page 75 are ludicrous. "Wilderness designation, however, would prohibit the use of motorized vehicles and thus the 102-4 ORV volunteer labor. The planting projects would still be possible without the use of vehicles but would be more difficult and time consuming, and the extent of the areas planted would be greatly reduced." We challenge your thinking. A raft can carry more than a sand rail. The trees and necessary equipment could just as easily be carried in a raft or canoe. Since you would not be planting directly by the river, doing this during rafting season (March-May or June) would not be a problem with the higher water then as opposed to the lower water months when ORVs could traverse the area.

Wilderness designation does allow for motorized use under special circumstances so that if you could not do the planting with the labor we have suggested, it would be possible to utilize ORVs. With some creativity, special language allowing this ORV use only for this purpose could be developed in the legislative bill. This negates your entire line of logic expressed on page 75.

The Gila Box is a spectacular, roadless canyon exhibiting outstanding scenic qualities, vegetal diversity, geological drama and offers unexcelled habitat for birds of prey as well as outstanding opportunities for self-propelled wilderness recreation. It merits wilderness designation.

Peloncillo Mtns.: We find logic missing in your discussions. No wilderness was selected because " of management problems caused by highly 102-5 irregular boundaries." Many areas in the wilderness system have highly irregular boundaries. This is not a reason for withholding wilderness designation.

Needle's Eye: We applaud your wilderness recommendation for this area and 102-6 suggest the vehicle way your proposal calls for cutting out is not an active usable vehicle way and that the acres should be left in the proposal.

Black Rock: We support a full acreage wilderness because, again, your reasons for not including 1,902 acres in your proposed action are due to a desire to obtain a "more manageable wilderness area."

Fishhooks: We do not agree with your reasons for not designating 4,930 acres of the area as wilderness.

Day Mine: Your reasons for not recommending any wilderness for this

102-7 area are not understood by us. "Though this WSA meets the basic wilderness criteria, it would not be designated because of low wilderness values and the presence of similar but higher wilderness values in nearby Fishooks WSA." We have not found information in the DEIS to substantiate your reasoning. On page 44 your list of threatened, endangered and sensitive wildlife shows the same number and same species in both areas. We believe your decision to eliminate the area was due to subjective evaluation. What is considered a low wilderness value to one person may not be such to another. We suggest you reconsider.

Turtle Mountain: Your reasons for not recommending wilderness for this

102-8 pristine, high country grassland are not sufficient to us. You say your recommendation is due to "low wilderness values, problems of manageability caused by inholdings and access to them, and conflicts with implementing a grazing system." We understand the State Game and Fish Dept. is highly interested in this area and that Rocky Mt. Bighorn Sheep are moving into the area. The area contains a historic trail from Safford to Morenci and is contiguous to the Gila Box WSA. These are reasons it should be recommended as a wilderness area and we hope you reconsider.

Javelina Peak: You have rejected the area "because of low wilderness

102-9 values and conflicts with ORV use." However, on pages 32 and 33 of the DEIS you state "The southern portion of the WSA is dominated by heavily vegetated dunes of potential ecologic significance." You go on to state "Scenic, geologic, and paleontological features enhance the WSA's wilderness values." We fail to understand how the WSA can have a low wilderness value when it has the values you

mention. Although you mention a few human imprints on page 32 you then state "Most of these imprints little impair naturalness." We feel the uniqueness of the dunes and the paleontological values are such that the area should be recommended for wilderness.

Happy Camp Canyon: You have rejected 7,523 acres of the WSA for wilderness

102-10 recommendation because you claim these "include areas with lower wilderness values and most known mineralized areas." On page 2 under impacts to minerals and energy you state that "Designating an area as wilderness would close it to all new claim staking, prospecting, and exploration work under the mining laws." This is simply not true. Prospecting and exploration work could continue. No ground disturbing activities could be conducted, however. But, other types of exploration work could go on. Your incorrect statement is a glaring miscomprehension of the wide range of exploration techniques which can be used and are available for use. This is a very serious error on your part and must be corrected in the final EIS.

We do not feel the acres should be eliminated for the reasons given because exploration can continue under the wilderness act.

Gila Box: We have an additional comment to make. Aravaipa is a well-known area throughout the United States for riparian backpacking and hiking and bird watching. People come from the entire country, there is a long waiting list on weekends. The Gila Box has the potential for providing an alternative to the crowding and waiting for Aravaipa. It offers outstanding bird watching and easy hiking and backpacking in the river during periods of low water. We feel the district should strongly take this into consideration. Those who are unable to obtain an Aravaipa permit could easily experience much of the same type of atmosphere (river bed, cottonwoods etc.) in the Gila Box. We feel the Gila Box has the potential to be the finest riparian area in the southwest.

We thankyou for the opportunity to comment on your DEIS.

Sincerely,

Charles Watson

Charles Watson, Director

RESPONSE — LETTER 102

102-1 See Response 1-2.

102-2 See Response 15-2.

102-3 See Response 101-2.

102-4 The current tree planting project has used volunteers of many interests. Trees were brought in by raft as well as ORVs. Subsequent waterings were accessed by foot, raft and ORV as conditions warranted.

102-5 The Wilderness Study Policy (BLM 1982c) requires an assessment of the manageability of an area as wilderness. We must ensure that those areas recommended suitable for wilderness can be managed as wilderness in a manner which enables the entire area designated to remain as wilderness in the long term. With the irregular land pattern of the Peloncillo Mountains WSA we cannot ensure that the wilderness values can be preserved. Incompatible adjacent land uses could impair wilderness values of the WSA.

102-6 The vehicle way in the eastern portion of Needle's Eye WSA is an active way used primarily by the rancher in the area. Recreationists may also use it.

102-7 See Response 31-1.

102-8 See Response 31-3.

102-9 See Response 31-4.

102-10 Our statement on pages 2 and 65 of the draft EIS is correct. However, prospecting can continue after a wilderness is closed to mineral energy. Section 4(d)(3) of the Wilderness Act of 1964 states:

> Notwithstanding any other provisions of this Act, until midnight December 31, 1983, the United States mining laws and all laws pertaining to mineral leasing shall, to the same extent as applicable prior to the effective date of this Act, extend to those national forest lands designated by this Act as "wilderness areas"; subject, however . . .

This section closes designated wilderness to new claim staking, prospecting, exploration and patenting under the mining laws after December 31, 1983.

Section 4(d)(2) of the Wilderness Act, however, provides for prospecting for the purposes of gathering minerals or other resource information if conducted in a manner compatible with the preservation of wilderness. Section 4(d)(2) states:

> Nothing in this Act shall prevent within national forest wilderness areas any activity, including prospecting, for the purpose of gathering information about mineral or other resources, if such activity is carried on in a manner compatible with the preservation of the wilderness environment. Furthermore, in accordance with such program as the Secretary of the Interior shall develop and conduct in consultation with the Secretary of Agriculture, such areas shall be surveyed on a planned, recurring basis consistent with the concept of wilderness preservation by the Geological Survey and the Bureau of Land Mines to determine the mineral values, if any, that may be present; and the results of such surveys shall be made available to the public and submitted to the President and Congress.

While Section 4(d)(2) does provide for prospecting, BLM feels there is a significant difference in the type of prospecting allowed by this section and that which the exploration industry would conduct under the mining laws. Thus the Bureau continues to feel its assessment of the impact on mineral exploration is not exaggerated or in error.

Comparison of the activities that could occur under the mining laws to the activities that can occur under Section 4(d)(2) of the Wilderness Act, lead us to the conclusion the potential differences are significant. While Section 4(d)(2) allows for non-impairing prospecting, the district believes the mineral industry will be limited in the information that can be collected using methods compatible with wilderness preservation. Eventually exploratory drilling becomes necessary to define the size of a mineral body and its quality. Due to the physical characteristics of the WSAs assessed in this EIS, exploration and the resulting surface disturbance may not be able to comply with wilderness protection constraints of Section 4(d)(2).

If there is no mineral value, then there is no need to explore. However, because of changes in economics and technology the mineral potential will never be fully understood. So BLM, as land managers, must make its assessment of the impacts. Based upon the data, the district feels its assessment of impacts to the mineral and energy resource is well documented and well made.

103

2821 East Weymouth Circle
Tucson, Arizona 85716
August 24, 1983

Mr. Les Rosenkrance, Safford District Manager
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance,

I am writing this letter in response to the draft EIS on your district's wilderness study areas. I am specifically concerned with the GILA BOX and wholeheartedly urge full wilderness designation for this 17,831 acres!

The conviction that this area merits protection as wilderness has been the result of my many experiences in more than 8 trips and 30 days of backpacking, rafting, and photography. These experiences have prompted me to rename the area, "Little Jewel of the Gila" in a recent article written for the Canyon Echo. I am not the first to view this area as a "Gem" worth fighting for. But I must point out that a jewel is often overlooked in the dust by those who believe themselves to be concerned with larger issues.

Why wilderness designation for The Little

-2-

Jewel? (The "Gila Box" is far too dull a name to describe what can be seen and enjoyed there.)

In the entire State of Arizona this is the only remaining, perennially running stretch of the Gila River which provides ideal riparian habitat.

It provides unique opportunity for a gentle-but-wild form of educational recreation for people who are not necessarily robust outdoorsmen -- school children and people who are aging.

It provides such opportunity for the enjoyment of peace, geological splendor wildlife watching without the necessity for expensive equipment. In many other areas, such enjoyment is barred except to those who can afford.

Where else in Arizona can one find a river which can be rafted by the inexperienced, poled Huckleberry Finn style by enthusiastic kids + adults on inner-tubes, fished by both young and old, walked or backpacked in the fall when the leaves are changing colors and its still warm enough to take a dip.

Little Jewel of the Gila

by Doris (Dew) Woods

Last night I cried on the banks of an "insignificant" section of river which, I understand, may never be protected as wilderness. I'm an emotional sort and so, when I find myself feeling helpless to protect a place I have grown to love, all that's left for me to do is cry . . . And write.

I've been told that I'm really not an environmentalist. That's probably true. My qualifications are only as a lover of truely wild and beautiful places.

I don't know what "the issues" are. I easily tire of political rhetoric. And so, I can only present here, the truths as I see them.

These truths are in the form of what I have seen and experienced in my encounters with the *Gila Box*. I share these with you now in the hope that it still isn't too late to make a difference.

I call it "Little Jewel of the Gila" because it's a place of rare beauty which is so small, geographically speaking, that it seems difficult to get very many people to notice it or really fight for it. It's a part of a national treasure which will soon vanish because so many people can only think big. A jewel can go so easily unnoticed in the dust when people concern themselves with "larger issues" and "more vast horizons." Or, when they defeat themselves by squabbling over pet projects, trading away what was never theirs to trade.

I heard a man I have admired say, "You can have X thousand acres of this if you'll protect the place I value most."

Which of us has the right to barter away a part of our shared treasure in the service of what he loves best! And who exists that can guarantee the bargain? What continuity of government exists that can secure such a pact?

The last people to have faith in such guarantees found themselves with hundreds of broken treaties, on reservations, and watching their precious wildlands raped in every manner possible given the technology of the times.

Yesterday, I walked along a creek which is privately owned and was strafed by a female Peregrine Falcon. She exhibited continuing concern until I removed myself from her nesting area. Walking further I saw a pair of Black Hawks soaring and calling where I had seen only one the week before. Eagle Creek is well-named and feeds its waters into the Little Jewel of the Gila. What the birds want is a private and peaceful place to nest and raise their young. I was an intruder there, briefly stealing a little of their privacy for my own before walking on.

We made our camp in a very old grove of Mesquite trees. The raft trip from Clifton down the San Francisco River had begun as my "daring" attempt to experience the Little Jewel in my own time and in my own way. With the intuition of the ignorant I threaded my new raft down the river's winding course, passing its confluence with the Gila, and oaring on to Eagle Creek.

I had made the trip with others many times before. I was always overwhelmed by their observations which were beyond my knowledge. There were astute observations which were liberally sprinkled with legal technicalities, the relative ages of trees, appropriate grazing patterns, exquisitely detailed awareness of habitat, impending dam projects, and a bunch of other stuff that made no sense to me whatsoever. Not to mention their endless arguements over who had the better right to enjoy this wonderful place.

Now show me a pair of beautiful and rare hawks and you get me where I live! Though I'm not a birder I appreciate beauty and freedom and the semblance of life which has long-since vanished from that canyon of concrete where I was raised. That beauty exists in intimate pockets of natural splendor which are easily sacrificed or bartered as though they were not alive.

If you want a catfish for breakfast or dinner, you can walk in silence along the Little Jewel and find some secluded hole to drop in a line. Even I, clumsy fisherwoman that I am, procured a tasty breakfast. It wasn't very hard. The fish have the innocence of the wilderness. As an additional definition of wilderness, that certainly could be included. When the fish haven't wised up to man's (or woman's) wily ways, *that's* wilderness!

The cattle are more sophisticated. They see us coming and run. I've been told they have become part of the danger to the Little Jewel by munching down the sapling Cottonwood trees.

The lovesick owl that I heard last year probably finally found a mate. The call sounded somehow more contented and less insistent than it had last March, when I was there with a group of children from a Tucson private school.

The grove of Mesquite sheltered so many birds

continued on page 2

NEXT CANYON ECHO DEA[illegible]:
AUGUST 15

Articles inside include: ***Herbicide Update, Solar Magazine Offer, Colorado River Flooding, Jonothan Marshall, Arizona Chosen for Convention Delegate Project, Acid Rain, Earth First Festival, Outings, Group News, and more!!***

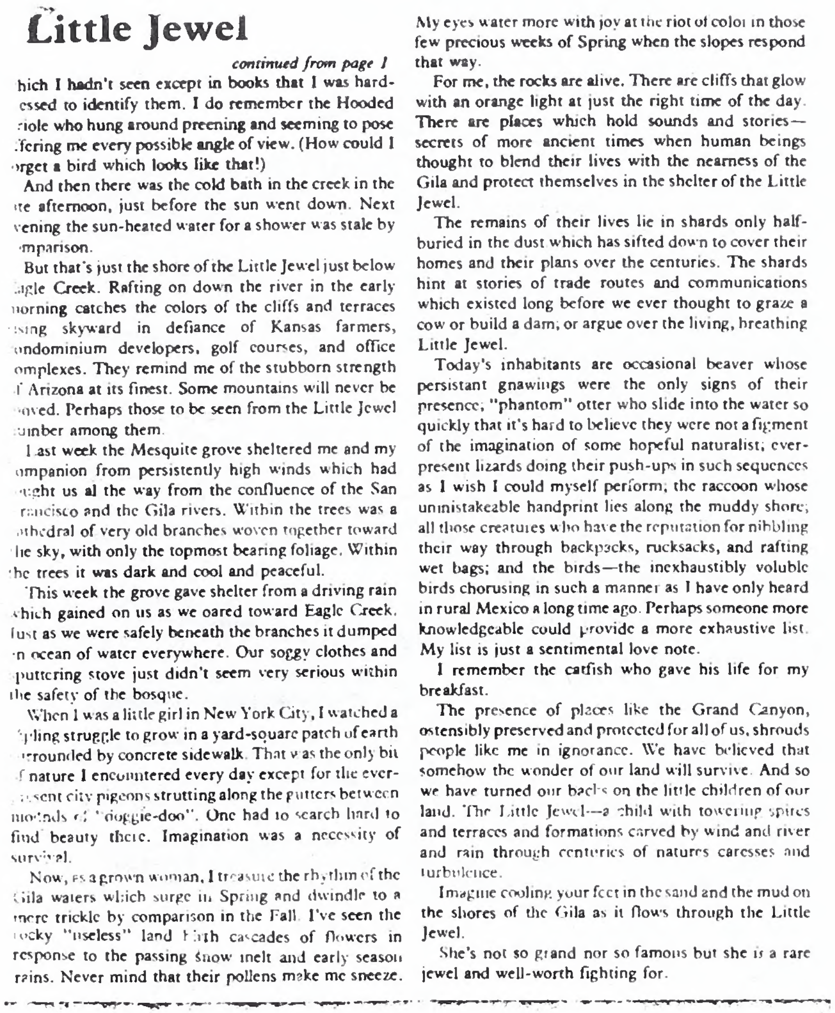
3

Rather than reiterating further material already presented in my article, I have enclosed a copy to be considered as a part of the body of this letter and insist that it be included in your hearing record and that it be printed in your final EIS as part of my personal comments

As a final remark, may I suggest that perhaps off-road vehicle lovers might park their wheels at some designated spot and learn to improve their general health by walking and enjoying the silence. In a protected Little Jewel of the Gila (GILA BOX) we could all lend a hand in replanting the cottonwoods!

Very sincerely
Doris (Dew) Woods, Ph.D
DORIS (DEW) WOODS

DW/enc



Little Jewel

continued from page 1

hich I hadn't seen except in books that I was hard-essed to identify them. I do remember the Hooded riole who hung around preening and seeming to pose fering me every possible angle of view. (How could I rget a bird which looks like that!)

And then there was the cold bath in the creek in the te afternoon, just before the sun went down. Next vening the sun-heated water for a shower was stale by mparison.

But that's just the shore of the Little Jewel just below agle Creek. Rafting on down the river in the early norning catches the colors of the cliffs and terraces sing skyward in defiance of Kansas farmers, ondominium developers, golf courses, and office omplexes. They remind me of the stubborn strength f Arizona at its finest. Some mountains will never be oved. Perhaps those to be seen from the Little Jewel umber among them.

Last week the Mesquite grove sheltered me and my ompanion from persistently high winds which had ught us al the way from the confluence of the San rancisco and the Gila rivers. Within the trees was a athedral of very old branches woven together toward he sky, with only the topmost bearing foliage. Within he trees it was dark and cool and peaceful.

This week the grove gave shelter from a driving rain hich gained on us as we oared toward Eagle Creek. ust as we were safely beneath the branches it dumped n ocean of water everywhere. Our soggy clothes and puttering stove just didn't seem very serious within he safety of the bosque.

When I was a little girl in New York City, I watched a pling struggle to grow in a yard-square patch of earth rrounded by concrete sidewalk. That was the only bit f nature I encountered every day except for the ever-sent city pigeons strutting along the gutters between mounds of "doggie-doo". One had to search hard to find beauty there. Imagination was a necessity of survival.

Now, as a grown woman, I treasure the rhythm of the Gila waters which surge in Spring and dwindle to a mere trickle by comparison in the Fall. I've seen the ocky "useless" land birth cascades of flowers in response to the passing snow melt and early season rains. Never mind that their pollens make me sneeze. My eyes water more with joy at the riot of color in those few precious weeks of Spring when the slopes respond that way.

For me, the rocks are alive. There are cliffs that glow with an orange light at just the right time of the day. There are places which hold sounds and stories—secrets of more ancient times when human beings thought to blend their lives with the nearness of the Gila and protect themselves in the shelter of the Little Jewel.

The remains of their lives lie in shards only half-buried in the dust which has sifted down to cover their homes and their plans over the centuries. The shards hint at stories of trade routes and communications which existed long before we ever thought to graze a cow or build a dam; or argue over the living, breathing Little Jewel.

Today's inhabitants are occasional beaver whose persistant gnawings were the only signs of their presence; "phantom" otter who slide into the water so quickly that it's hard to believe they were not a figment of the imagination of some hopeful naturalist; ever-present lizards doing their push-ups in such sequences as I wish I could myself perform; the raccoon whose unmistakeable handprint lies along the muddy shore; all those creatures who have the reputation for nibbling their way through backpacks, rucksacks, and rafting wet bags; and the birds—the inexhaustibly voluble birds chorusing in such a manner as I have only heard in rural Mexico a long time ago. Perhaps someone more knowledgeable could provide a more exhaustive list. My list is just a sentimental love note.

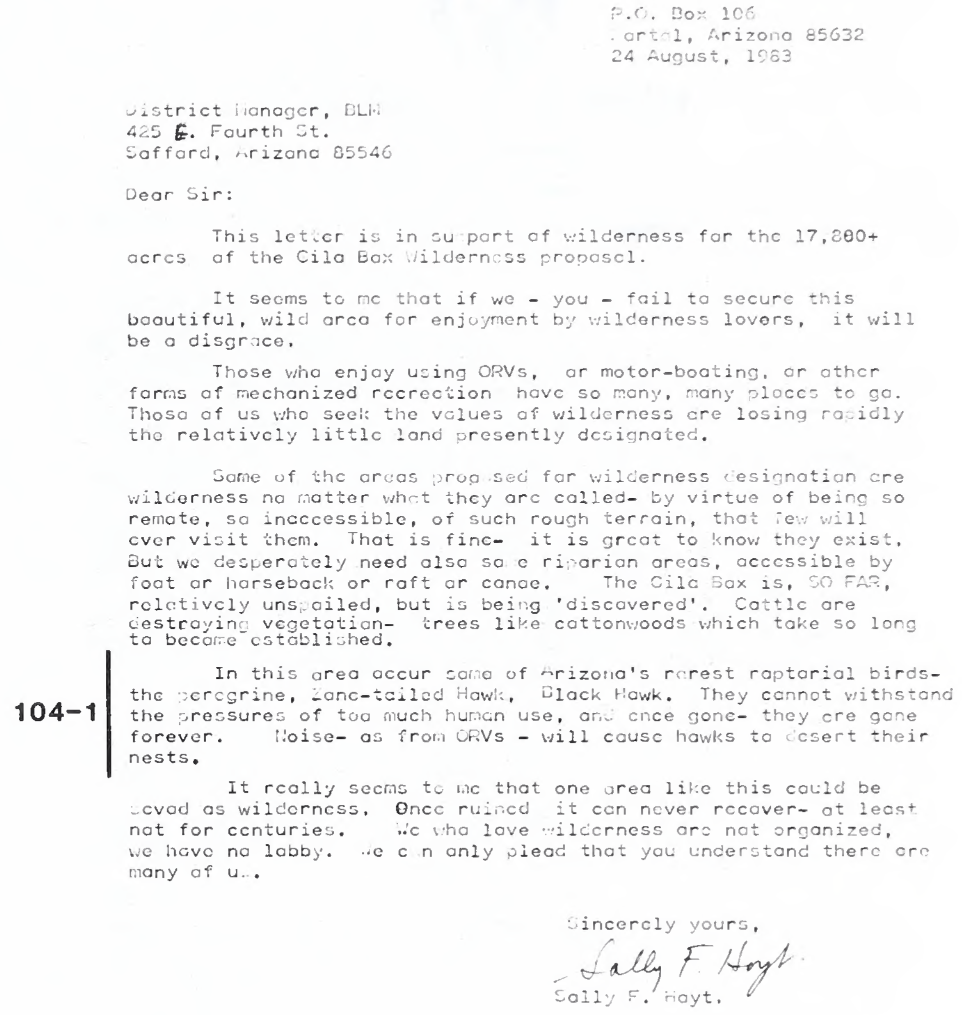
I remember the catfish who gave his life for my breakfast.

The presence of places like the Grand Canyon, ostensibly preserved and protected for all of us, shrouds people like me in ignorance. We have believed that somehow the wonder of our land will survive. And so we have turned our backs on the little children of our land. The Little Jewel—a child with towering spires and terraces and formations carved by wind and river and rain through centuries of naturrs caresses and turbulence.

Imagine cooling your feet in the sand and the mud on the shores of the Gila as it flows through the Little Jewel.

She's not so grand nor so famous but she is a rare jewel and well-worth fighting for.

104



P.O. Box 106
Portal, Arizona 85632
24 August, 1983

District Manager, BLM
425 E. Fourth St.
Safford, Arizona 85546

Dear Sir:

This letter is in support of wilderness for the 17,880+ acres of the Gila Box Wilderness proposal.

It seems to me that if we - you - fail to secure this beautiful, wild area for enjoyment by wilderness lovers, it will be a disgrace.

Those who enjoy using ORVs, or motor-boating, or other forms of mechanized recreation have so many, many places to go. Those of us who seek the values of wilderness are losing rapidly the relatively little land presently designated.

Some of the areas proposed for wilderness designation are wilderness no matter what they are called- by virtue of being so remote, so inaccessible, of such rough terrain, that few will ever visit them. That is fine- it is great to know they exist. But we desperately need also some riparian areas, accessible by foot or horseback or raft or canoe. The Gila Box is, SO FAR, relatively unspoiled, but is being 'discovered'. Cattle are destroying vegetation- trees like cottonwoods which take so long to become established.

104-1 In this area occur some of Arizona's rarest raptorial birds- the peregrine, Zone-tailed Hawk, Black Hawk. They cannot withstand the pressures of too much human use, and once gone- they are gone forever. Noise- as from ORVs - will cause hawks to desert their nests.

It really seems to me that one area like this could be saved as wilderness. Once ruined it can never recover- at least not for centuries. We who love wilderness are not organized, we have no lobby. We can only plead that you understand there are many of us.

Sincerely yours,

Sally F. Hoyt

Sally F. Hoyt.

RESPONSE — LETTER 104

104-1 See Response 1-2.

105

FRANKLIN IRRIGATION DISTRICT
P.O. BOX 171
DUNCAN, ARIZONA 85534

August 23, 1983

District Manager
Bureau of Land Management
U.S. Department of Interior
425 East 4th Street
Safford, Arizona 85546

Dear Sir:

We wish you to know that we support and applaud your decision to not include the Camelsback Dam Site in a Wilderness designation.

We feel this area needs to remain accessible to appropriate development and use.

Sincerely,

FRANKLIN IRRIGATION DISTRICT

Norman L. Norton

Norman L. Norton, Secretary

106

Theodore L. Cogut
100 Agave
Morenci, AZ 85540

August 26, 1983

Mr. Lester Rosenkrance, District Manager
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85540

Dear Mr. Rosenkrance:

I would like to take this opportunity to indicate my support for the way you have handled the Gila Box and Turtle Mountain wilderness issue. For many reasons, restricted use of those areas, a concomitant of Wilderness designation, would not be beneficial to local residents. Nor would it, in my judgement, be beneficial to those who live outside the area.

It is not necessary to repeat here the great need for flood control on the Gila; the costs of flood damage are all too painfully familiar to area communities. However, as a local nine-year resident, I can tell you that such a dam could also do much toward satisfying what I perceive to be a not insignificant need for a relatively expansive nearby water-recreation site. Such a facility, incidentally, could obviously be enjoyed by visitors from afar; and this would provide to the local area an economic boost in the form of much-needed diversification of commercial enterprise.

I would not want, by inadvertent comparison, to minimize the benefits of flood control and recreation that I believe are greatly needed and that remain a possibility so long as Wilderness designation is not made; but in this day of much too familiar energy problems one should not overlook the possibility of also thereby acquiring a source of hydroelectric power. Nor should we minimize the potential for energy development from the hot springs on the Gila. Both of these beneficial outcomes would be interfered with should a Wilderness designation be adopted.

There are of course many other objections to Wilderness designation in those areas, and not the least of these is the long-standing and large Phelps Dodge mining operation that surely is much too close to make possible the solitude that I believe is or should be a requirement of a Wilderness area. I will merely close by reaffirming my support for continuance of the land management program in the Gila Box and Turtle Mountain areas in the manner in which you have been handling it. Reasoned evaluations of the issue, in my judgement, must terminate in the conclusion that your present stewardship of those areas is the proper and most beneficial one.

Sincerely yours,

Theodore L. Cogut

Theodore L. Cogut

107

Jimmie L. Gullion
109 Ironwood Road
Morenci, AZ 85540

August 25, 1983

Mr. Lester Rosenkrance, District Manager
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

These are my comments in regard to BLM's decision not to designate the Gila Box and Turtle Mountain areas as wilderness areas.

I am against the continuing taking of public lands and the depositing of them in a land bank called "Wilderness." I am told that the land will still be available for hiking and backpacking--a past time for the young and healthly. What about our senior citizen who doesn't have the stamina for hiking? I have heard many complaints from the elderly who believe an inherited right is being taken away. And what about the well-being of our nation which depends on the exploration and development of minerals and oil? The designation of these specific areas as wilderness may very well interfere with the adjacent, already established mining industry.

We also need to use our rivers in a way that will optimize water usage and provide flood control which would be restricted by Wilderness designations. Let's build the flood control dams, develop hydropower, and thereby create water recreation areas which will benefit all the people.

Let's abandon all restrictive backward steps and move into the future managing our public lands in a way that makes use of all their resources. With these thoughts, I am sure the earlier wise decisions of BLM will prevail.

Sincerely yours,

Jimmie L. Gullion

Jimmie L. Gullion

c: Mike Schern

108

DAVID M. PERKINS,
County Administrator and Clerk
865-2072 865-3322

JACKIE D. COOPER, Morenci
ANGEL R. CUETO, Clifton
H.J. MILLER, Duncan

County of Greenlee

BOARD OF SUPERVISORS
P.O. BOX 908
CLIFTON, ARIZONA 85533

August 23, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

In June, 1983, the Safford District of the Bureau of Land Management published a Draft Environmental Impact Statement for the wilderness designating wilderness study areas in the Safford District including lands in Greenlee County, Arizona. In the June DEIS, the BLM proposed action recommended multiple use, non-wilderness designation for the Gila Box 4-22/23/24(A) and Turtle Mountain 4-22/23/24(B) WSA units.

This proposed action by the BLM would allow continued multiple use of these public lands by the residents of Greenlee County, including vehicular access along river bottoms by all citizens who so desire, including the elderly, very young, or handicapped whose only means of transportation may be vehicular. This method of lands management will also allow Greenlee County to pursue meeting additional needs of the area by leaving open the future options for flood control, energy development, free recreation access, and unhampered growth of existing economic uses and development in Greenlee County.

The Greenlee County Board of Supervisors supports the recommendation to return the Gila Box and Turtle Mountain WSA units to multiple use classification.

Sincerely,

GREENLEE COUNTY BOARD OF SUPERVISDRS

Angel R. Cueto
Chairman

109

1961 W. Brichta
Tucson AZ 85745
Aug 25, 1983

Mr Rosenkrance
Safford District Manager
BLM
425 E 4th Street
Safford AZ 85546

Dear Mr Rosenkrance

I cannot help but be utterly amazed at the beauty, uniqueness, and human value inherent to the small area in your district called the Gila Box. This area, though very small, is incredible for its richness of birds, plants, geologic formations, Indian sites and even large bat caves.

Somehow such a tiny unique area deserves all of our protection: after all, the area has so little current economic

109–1 use and yet is such a public heritage. So far as I know the only major use of the Gila Box is for OKV use. This really seems rather extravagant; that is allowing vehicles to damage the area (ruts, banks destroyed, seedlings crushed, litter, noise, etc) when the vast majority of the public land in your district is open to such, often reasonable use. Can you not encourage making the 17,831 acres of the Gila Box a full wilderness area? A dam in the area will silt full in 50 years if built; the ~~rare~~ river otters and black hawks will disappear due to OKV use (and noise) if the area is opened; and the opportunity of a lifetime for old, young, and handicapped people to experience a gentle river and beautiful canyon will be lost if the area is developed. These losses seem too great to justify not designating the area as a wilderness area.

Please consider seriously making a decision you can be proud of – protecting a tiny gorge in our desert for all of us and future generations.

Sincerely

Just Schmidt,

Justin Schmidt, Ph.D
Research Biologist

RESPONSE — LETTER 109

109-1 See Response 1-2.

110

August 25, 1983

District Manager
Bureau of Land Management
425 E. 4 Street
Safford, Az. 85546

Dear Sir:

I would like to urge designation of the Gila Box as a wilderness area. The area possesses outstanding wilderness values as well as habitat for rare raptors (black hawks, peregrine falcons, and bald eagles) and numerous other wildlife species. The whole of the 17,831 acre Gila Box should be designated wilderness.

Sincerely,
Barbara Conrad

111

Paul W. Huddy
5029 E. Shaw Butte
Scottsdale, AZ 85254
July 12, 1983

Bureau of Land Management
Safford District
425 E. 4th St.
Safford, AZ 85546

RE: Draft EIS for wilderness designation -- Needle's Eye WSA

Dear Sirs:

Having hiked in this area, I would like to comment on your proposal for Wilderness designation of this WSA. It is, as you note in your Draft EIS, very rugged and untouched, as well as unique in many respects. Friends of mine have had the remarkable experience of exploring the Gila River on inner tubes through this section: they reported being very impressed with what they saw and how surprised they were at the wonderful condition of the land.

I find it interesting that along the entire course of the Gila River -- the only river that traverses the width of Arizona -- there are only two small sections of land left that federal agencies deem suitable for Wilderness status. This is remarkable. Considering the biological and historical significance of this river, I think that this alone is sufficient reason to preserve the Needles Eye and Gila Box WSAs in this way.

From my own knowledge of the area and what I read in your report, I feel that this is a prime candidate for inclusion in the National Wilderness Preservation System and urgeselection of the "all wilderness" alternative. It's a shame that you found so little left of this singular resource to preserve in the lands entrusted to your care.

Sincerely yours,

Paul W. Huddy

112

1220 W. Las Lomitas
Tucson, Arizona 85704
26 August 1983

District Manager
BUREAU OF LAND MANAGEMENT
425 E. Fourth Street
Safford, Arizona 85546

Re: Draft = EIS
Safford District Wilderness

Congratulations Gentlemen:

On a well done "Environmental Impact Statement".

I note that the proposed action calls for only 34,881 acres of wilderness. My personal opinion, of course, is to recommend "All Wilderness"; however in view of the fact that we all must be willing to "trade off", would be willing to settle for the 98,618 acres under the "Enhanced Wilderness" proposal.

To reduce the "All Wilderness Proposal" by 73.5% as indicated in your proposed action does not seem reasonable. We are all aware of the fact that should our country be placed in a crisis position laws would be enacted to alter the wilderness status of designated areas as would be necessary. I feel that it would behoove us to retain as much wilderness as possible so our children, their children and all who come after could enjoy at least a small portion of what we currently enjoy.

Thank you for the opportunity as a citizen to have a part and a voice in the disposition of one of the most valuable assets our country has.

Sincerely,

Gene I. Wendt

GIW/mb

113

phelps dodge Corporation Western General Offices, Office of the General Manager
Phelps Dodge Tower, 2600 N. Central Avenue, Phoenix, AZ 85004-3015 · (602) 234-8100

Ken C. Bennett
Executive Assistant

August 29, 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

Attached please find Phelps Dodge Corporation's comments on the Draft Environmental Impact Statement (EIS) for the wilderness designation of study areas in the Bureau of Land Management's Safford District, Arizona. We would like to commend the BLM Safford District staff on their conscientious work throughout the wilderness evaluation program. They have been the most thorough and objective BLM group that Phelps Dodge has worked with during the process. However, Phelps Dodge believes that the Draft EIS is deficient in several respects. *

As a member of the Arizona Mining Association, Phelps Dodge helped to develop and fully supports the comprehensive comments submitted by that organization. As a result of the Associations' thorough comments, Phelps Dodge has limited their remarks to the Gila Box WSA (AZ-4-22/23/24 (A)) and the Turtle Mountain WSA (AZ-4-22/23/24 (B)). In addition to the comments presented herein, we would like to reference the extensive comments submitted by Phelps Dodge on August 1980 on not only the Gila Box and Turtle Mountain, but also other wilderness study areas in the Safford District. **

Phelps Dodge concurs with the BLM Proposed Action that recommends non-wilderness designation for both the Gila Box and Turtle Mountain WSAs. We appreciate the opportunity to comment on the Safford District Draft Wilderness Environmental Impact Statement and we hope that our comments will be seriously considered.

Yours very truly,

Ken C Bennett

Ken C. Bennett
Executive Assistant

KCB/pm
Attachment
cc: J. L. Bolles
J. L. Haggard

Phelps Dodge Corporation Comments
on the
Bureau of Land Management
Safford District
Draft Wilderness
Environmental Impact Statement

Phelps Dodge Corporation
Western Operations
2600 North Central Avenue
Phoenix, Arizona 85004-3015
August 26, 1983

INTRODUCTION

The following represents Phelps Dodge Corporation's comments on the Safford District Wilderness Environmental Impact Statement. We would first like to commend the staff of the Safford District BLM Office for their significant and quality work performed during this Wilderness Evaluation Program. It is Phelps Dodge's opinion that BLM Safford District has been the state's leader in their analysis of potential wilderness areas.

As a member of the Arizona Mining Association, Phelps Dodge fully supports the comprehensive comments submitted by that organization and limits these additional remarks to two areas: Gila Box (AZ-4-22/23/24 (A)) and Turtle Mountain (AZ-4-22/23/24 (B)). We concur with the BLM Proposed Action that recommends non-wilderness designation for both of these Wilderness Study Areas (WSAs).

GILA BOX WSA - Comments at recent public hearings by wilderness proponents focused almost entirely on the San Francisco and Gila River canyons which make up a relatively small part of the WSA. These attractive canyons and their riparian systems represent valuable resources worthy of conservation and proper management, but the WSA does not qualify and need not be designated as wilderness to protect, maintain and enhance the attractiveness of the river canyons to a wide variety of interests. Much of the upland area in the WSA fails to meet wilderness criteria and past studies have already showed that the river canyons do not meet the criteria for designation as wild and scenic rivers.

River Canyons - According to the Draft EIS, off-road vehicle users spend an estimated 5,000 annual recreation visitor days in the Gila Box. Wilderness designation would foreclose this use, but such an exclusion would be very difficult for BLM to manage.

Rafting or canoeing the canyons during high water is another recreational use that has increased in popularity recently, but, unlike ORV use, it would not be foreclosed by wilderness designation. Some of the rafters place a high value on solitude and a rare opportunity to view native wildlife during these trips. They apparently feel that opportunities will be greatly reduced unless the area becomes wilderness. However, rafting on the rivers can only occur when water is high (during the spring) and ORVs can only traverse the canyons when water is low. Thus, it seems unlikely that a conflict in primary interest and use would occur.

There is no evidence that ORV use has seriously affected canyon resources despite many years of use. Raptors feed in the areas although they tend to nest elsewhere, particularly on nearby private lands along Eagle Creek. Large trees suitable for nesting raptors do not generally occur in the Gila Box WSA and have apparently been devasted by some past flood flows. There is some evidence that cattle have limited tree reproduction along the rivers, but the BLM program to plant trees and limit the cattle browsing in critical areas would be implemented without wilderness designation.

Thus, wilderness designation would lock out the main recreation users along the rivers, who are largely nearby residents, and reserve the area for a much smaller number of rafters and others who are largely not nearby residents. This would occur despite the fact that both groups could continue using the area and the important natural resources would continue to be protected without wilderness designation. Use by both of these groups at the same time does not appear to be compatible, but both can easily occur without conflict and without wilderness designation if prudently managed by BLM.

Upland Areas - The upland areas, which make up most of the WSA, are not outstandingly remarkable and are affected significantly in the north and the east by the sights and sounds of the mammoth Morenci Mine, the second largest open pit copper mine in North America. These intrusions will increase over the next several decades as mining operations continue to grow. Many uplands appear to represent buffer areas to help isolate the river canyons, but since many of these upland areas do not possess outstandingly remarkable attributes on their own, they should not qualify for wilderness designation.

San Francisco Subunit (see Figure 1) - Most significant is the San Francisco Subunit, an area on the east end that hangs on to the main unit of the Gila Box WSA by a gerrymandered thread of federal land only 440 yards wide. The subunit's small size, a private inholding of 80 acres, and convoluted boundaries should, by themselves, be enough to drop this area from consideration as wilderness. However, a multitude of other factors also militate against designation of the subunit as wilderness:

-the presence of mining overwhelmingly impacts the naturalness of most of the subunit because of sights and sounds that are audible for more than two miles and, although not an objectional activity of itself, large scale mining is a blatant contradiction to the purpose and criteria for establishing a wilderness area nearby.

-mining operations include the use of D-9 bulldozers, earth movers, water trucks and graders during 70% of each year to construct, enlarge and maintain tailing dams and related structures that occur as close as 1,200 feet from the San Francisco River in the subunit (see Figure 1).

-the present major impacts from mining operations will increase each year near the subunit as white textured tailing dams rise at the rate of 20 to 60 vertical feet per year and become more and more visible and imposing near the subunit; most upland areas on both sides of the San Francisco River have vistas with major visual and unnatural intrusions from the massive tailing dams and related structures (see Figure 1 and photograph exhibits).

-two so-called cherry stem roads have been removed from within the subunit but still adversely impact wilderness values, particularly the access road to Gillard Hot Springs which is used extensively by local residents.

The Gila Box WSA lies between the largest open pit copper mine in Arizona and relatively recent mineral discoveries in the Safford District are estimated to contain over a billion tons of copper ore, making the WSA a likely area for future mineral exploration. The entire area also is classified as prospectively valuable for geothermal resources with Gillard Hot Springs, in the eastern portion of the WSA, discharging the hottest water in Arizona. Wilderness designation would preclude mineral exploration in the WSA and adversely impact development of geothermal resources.

The new Southwest Tailings Dams (SWTD) upon completion will occupy surface area at least twice the size of the current, extremely noticable West Tailing Dam (WTD) system. Throughout the remaining life of the Morenci Mine greater than 100,000 tons per day, or a total greater than one billion tons of tailing, will be disposed of in the SWTD system. Approximately 7.3 million cubic yards or 14.6 million tons of material will have to be moved through 1990 and an additional 7.6 million cubic yards or 15.1 million tons moved through 2000 just in dam construction alone.

The planned ultimate configuration calls for a total of 19.9 million cubic yards or 39.9 million tons of material to be used in dam or berm construction alone on the SWTD system. These dams will grow from the existing height just above the San Francisco River to an ultimate height of 800 feet at a planned upper elevation of 4,400 feet.

Lower berms in the SWTD system will be constructed with native material or Gila Conglomerate, readily blending into adjacent hillsides with time. However, due to availability of material, upper portions will be constructed with the white-sandlike (tailing) material used in construction of the WTD system and will remain visible for miles. It is currently estimated that the lower 200 feet will be constructed with native materials and the upper 600 feet will be constructed with tailing.

These dams and safety catchments are all located within 5,000 feet of the San Francisco River. That 5,000 feet is sparsely vegetated gently rolling desert. It is not capable of obscuring the negative visual intrusion the tailings will have on true wilderness.

Portions of the SWTD system are already readily visible from the San Francisco River channel, not to mention from hillsides immediately above the channel. Earthmoving equipment used in dam construction, the continual moving of pipelines and general work for the life of the facility, is an overwhelming noise impact on wilderness qualities. Being conservative, one can easily hear bulldozers, scrapers, and other earthmoving equipment, (even outside of the line of site) over two miles from construction areas.

The WTD and SWTD systems are an integral part of the entire Phelps Dodge Morenci copper producing operation. Due to the confined nature of the available tailing disposal area - Eagle Creek to the west, Chase Creek to the east, and the San Francisco River to the south - any adverse constraints now or in the future could seriously jeopardize Morenci copper production. As noted in the San Francisco River Wild and Scenic River Study Report and Draft Environmental Impact Statement of July 30, 1980, if Segment C[*] was classified as wild, "The visual impact of mine developments on private lands seen from the south section would have to be eliminated. This would have a major impact on the local copper mining industry." The SWTD will present a significant, overwhelming impact on wilderness qualities of the San Francisco River area in the near future - easily comparable to the impact presented by the WTD system.

In addition to tailing disposal, the WTD and SWTD facilities play an integral role in water reclamation. It requires approximately 800 gallons of water to process one ton of ore from the Morenci Mine. That water is reclaimed after tailings disposal and reused several times prior to loss either through seepage or evaporation. Reclamation of water directly from the tailing ponds generally utilizes equipment at the upper ends of the pond and therefore does not affect the river areas either visually or audibly. However, the WTD has a known fault system that passes under the tailing dam. Reclamation of fault-controlled water seeping under the dam by reclaim-water wellfields does impact the wilderness qualities of the San Francisco SubUnit. Reclaim wellfields are necessarily located hydrologically downgradient or downstream from the dams. Electric pumps require powerlines, pipelines and booster stations with additional water storage and pumping equipment located in the wellfield areas.

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[*] "Segment C" or "South Segment" when discussing various Wild and Scenic River Reports refers to that portion of the San Francisco River between Clifton City limits and the confluence with the Gila River. Portions of that segment are now included in the San Francisco River Subunit.

Currently, reclaim wells are located only below the WTD system. An observation well network has been partially completed below and adjacent to the new SWTD system. This may be converted to a reclaim well system in the future as the dams increase in size, if currently unknown fault zones are encountered that allow passage of tailing water through the dam system. These facilities will be seen and heard from the river channel.

There remains a corridor open to wilderness study along the San Francisco River channel between the old Smuggler Mine and the confluence of the Gila and San Francisco Rivers. This corridor has already been studied for possible inclusion into the Wild and Scenic River System by the U.S. Department of Agriculture - Forest Service. It was recommended that the section not be designated into either wild, scenic, or recreational categories in a joint report by the USDA Forest Service and USDA Bureau of Land Management titled San Francisco River Wild and Scenic River Study Report and Environmental Statement dated April, 1981. This is the final report and recommendations on the San Francisco River were sent to the President on July 22, 1982 by Mr. John R. Block, Secretary of Agriculture.

Several of the reasons for that recommendation are as follows:

> p. 8 "Evidence of human influence is apparent throughout this section. The copper mines and their residues are visible. . . Although access routes are not maintained, there is evidence of vehicular traffic throughout the length of this section."

> p. 44 "Under an existing twenty-five year development plan, Phelps Dodge Corporation plans to use their property north and west of Segment C for a tailings disposal area. The Silver Basin tailings area and the Southwest tailings area and their check dams are now visible from the river."

"It was determined during the eligibility classification phase of the study that Segment C does not meet the criteria for a wild river or a scenic river classification."

p. 62 "A series of public meetings held in Clifton, Safford, and Phoenix, identified preliminary issues and concerns. These meetings resulted in about 100 written responses including resolutions for the Greenlee County Board of Supervisors and Clifton Town Council and a petition with over 1,300 signatures. Without exception, all these responses were opposed to either the study, designation, or both. . ."

p. 24 "Air quality within (the south section) of the study area is subject to degradation from the Phelps Dodge Corporation Morenci Smelter, located approximately four miles north of the south river section, smelter effects depend upon wind direction."

113-1 Phelps Dodge is concerned over the possible adverse impact that potential Class I air quality designation will have on its Morenci operation and therefore the economics of local cities, towns, counties, and school systems. In addition, the Federal government at some point in time, could acquire scenic easements on private lands owned by the Corporation, through zoning ordinance, purchase, or condemnation if necessary.

113-2 It is felt that the importance of the Safford-Morenci "mineral belt" which underlies the sub-unit should not be treated lightly (see Figure 2). Approximate delineation of this belt is shown by Richter, et al (1982 p.4) MineralResource Potential Map of the Gila-San Francisco Wilderness Study Area, Graham and Greenlee Counties, Arizona.* Richter (page 5) notes that the study area, in the mineral belt, lies in the center of and a few miles in

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*Richter, D. H., Klein, D. P., Lawrence, V. A. and Lane, M. E. (1982), Mineral Resource Potential of the Gila-San Francisco Wilderness Study Area, Graham and Greenlee Counties, Arizona, U.S. Geological Survey, Miscellaneous Field Studies, Map MF-1315-B.

113-2 either direction from the huge porphyry copper districts at Safford and Morenci. Porphyry copper deposits in the southwestern United States occur in clusters and these clusters are generally elongate northeasterly - similar to the Safford-Morenci trend.

The scope of this mineral potential can easily be recognized in terms of estimated gross metal values of those two districts. The following gross metal values are estimated using published reserve figures, $1.00 per pound copper, $500.00 per ounce of gold and $20.00 per ounce of silver. The Safford District (including deposits owned by Kennecott, Phelps Dodge, Inspiration, Producer Minerals) contains reserves in excess of 1.5 billion tons with gross metal values approaching $20 billion for copper and $9 billion for precious metals. Morenci District contains reserves in excess of 1 billion tons with gross metal values approaching $12-15 billion.

Richter also points out that, if present, additional porphyry copper deposits underlying the WSA will be buried to great depths by overlying barren, young volcanic rocks. This is certainly true, but evidence is available suggesting that intrusive rocks, of similar age and composition as those occurring at and responsible for deposits in Morenci and Safford, occur at much shallower depths than postulated by Richter. Changing economics for base and precious metals could make this area extremely attractive for additional exploration at some time in the future.

Richter (1982 p. 1) notes that no placer mining activity was observed during the study period in 1979 and 1980. It also should be noted that numerous individuals have attempted to set-up placer operations along the San Francisco River in recent years. However placer miners have been discouraged because the entire San Francisco and Gila River corridors through the study area have been closed to mineral entry by the U. S. Army Corps of Engineers because they lie in the backwater area of the proposed Camelback Dam.

TURTLE MOUNTAIN WSA - This area shares a position along with the Gila Box WSA between the largest open pit copper mine in Arizona and the Safford Mineral District, each estimated to contain over a billion tons of copper ore, making the WSA a likely area for future mineral exploration.

Similarily, the entire area is classified as prospectively valuable for geothermal resources. Wilderness designation would preclude mineral exploration and geothermal resource development.

Turtle Mountain WSA also shares with Gila Box WSA close proximity to the facilities of the Morenci open pit copper mine. Smelter emissions can often be seen from within the WSA and the same unnatural appearance of the huge tailing dams and waste dumps are visible from many locations, particularly in the eastern part of the area. The major increase in size of both tailing dams and waste dumps will greatly increase the visual intrusion of these structures in the years hence.

Human imprints largely related to livestock improvements impair the naturalness of the WSA and additional proposed improvements would result in a significant cumulative impairment. Wilderness designation would foreclose development of these additional livestock improvements and efficient utilization of the grazing resource.

Turtle Mountain WSA appears to be unsuitable for wilderness designation because inholdings present an unsurmountable manageability problem. The present WSA contains three private inholdings totaling 285 acres, a large state inholding of 640 acres as well as transmission line and pipeline rights-of-ways. 113-3 The inholdings would have to be granted vehicle access if it was requested after wilderness designation occurred. One anticipated road, 2.5 miles in length, would significantly impair wilderness characteristics in major portions of the WSA.

Mobile Mineral Belts

In addition to Richter's data that indicates that porphyry copper deposits in the southwestern United States occur in clusters which are generally elongate in a northeasterly direction (inferring that the Safford District and the Morenci District between the two areas of major copper deposits contain significant potential for additional copper deposits) it is a well known fact within the mineral community that copper occurrences are not haphazard, but are located along well defined zones or belts. Ten years ago, Harrison Schmitt, Sr. proposed copper mineral belts that connected the Santa Rita ore body near Silver City with the Morenci ore body in eastern Arizona. Little activity was conducted along these zones until mid-1975 when Exxon Minerals Corporation discovered the Pinos Altos copper deposit north of Silver City. This discovery touched off numerous exploration projects within these mineral belts. Figure 3 and Table 1 show the project concentration that has occurred along these belts and the producing and developing properties that have been discovered. At least three of these mobile mineral belts, trending approximately N 65° W traverse Graham and Greenlee counties in Arizona and extend into southwestern New Mexico.

The Safford Mineral Belt contains the large copper deposits of Phelps Dodge Corporation (Dos Pobres), Kennecott Copper Corporation (Lone Star Extension), Producers Minerals (San Juan) and Inspiration Consolidated Copper Company (Sanchez). In addition, numerous excellent exploration targets occur within this belt and are actively being prospected.

The extent of the Safford Mobile Mineral Belt in a northeast and southwest direction is not absolute. There is a distinct possibility that the mineral belt could extend northward, and in fact, coincide with the Morenci-Tyrone Mineral Belt as exploration in the Safford District continues.

The Morenci-Tyrone Mineral Belt contains the large well known copper deposits of Morenci, Metcalf and Tyrone. Many smaller deposits also occur within this belt, including those of the Steeple Rock Mining District of New Mexico. Numerous exploration targets occur within this mineral belt and a large number of mining companies are presently examining these prospects. The Morenci-Tyrone Mineral Belt intersects the northern half of the Gila Box (4-22/23/24(A)) and the northern half of the Turtle Mountain (4-22/23/24(B)) BLM Wilderness Study Areas. These areas should be deleted from further consideration due to the strong mineral potential shown within the mineral zone. There is a high probability that continued exploration of lands surrounding Morenci, Arizona and Tyrone, New Mexico will delineate additional significant copper finds.

The Blue Range-Santa Rita Mineral Belt contains the well known Santa Rita deposit, or Chino Open Pit of Kennecott Copper Corporation. In addition, the recent discovery of the Pinos Altos copper deposit by Exxon Minerals Corporation occurs north of Silver City, New Mexico well within the mineral belt. This copper discovery was based on the Mobile Mineral Belt Theory and has subsequently led Exxon Minerals and other companies to increase their exploration efforts along the belt into Greenlee County, Arizona. An abundance of mineral exploration targets have been delineated and active exploration for potential mineral prospects continues at a substantial pace along the Blue Range-Santa Rita Mineral Belt. Phelps Dodge Corporation conducted a sustained exploration program within the Blue Range Primitive Area for six years before they terminated their program due to Forest Service administrative delays, resulting inordinate costs and a copper industry depression which continues today. The program culminated with the discovery of copper mineralization approximately 2,000 feet below post-mineral volcanics, adding strength to the theory that the mineral belt is a reality and that copper ore bodies may lie beneath volcanic cover.

The mineral potential of lands lying within these three zones has never been evaluated thoroughly including the areas covered by the Gila Box WSA and the Turtle Mountain WSA, and as shown by the intensity of exploration activities and discoveries, the potential appears to be significant.

We appreciate this opportunity to comment on the Safford District Draft Wilderness Environmental Impact Statement and to express our agreement with the BLM Proposed Action that recommends non-wilderness designation for the Gila Box and Turtle Mountain WSAs.

Table 1

Mobile Mineral Belt Influence on BLM Wilderness Study Areas

(Updated to January 1, 1979)

Ⓐ Producing and Developing Properties

A. Dos Pobres Copper Orebody owned by Phelps Dodge Corporation, currently in the development stage.

B. San Juan Copper Orebody owned by Producers Minerals, currently in production.

C. Lone Star (Safford) Copper Orebody and the Lone Star Extension Copper Orebody owned by Kennecott Copper Corporation, currently in the development stage.

D. Sanchez Copper Orebody owned by Inspiration Consolidated Copper Company, currently in production and development stages.

E. Morenci Open Pit Copper Orebody owned by Phelps Dodge Corporation, producing since 1882, includes over 100 small past producing mines, cumulative production estimated at 3 billion dollars (reference 1). Third largest open pit mine in the world.

F. Metcalf Mines (Metcalf Ridge Open Pit Copper Orebody and King Ridge Open Pit Copper Orebody) owned by Phelps Dodge Corporation, producing as open pits since 1972, includes over 50 small past producing mines, cumulative production estimated as above to be over 3 billion dollars (reference 1).

G. Laura Mine, Summit Mine, and Bank Mine of the Steeple Rock District. Gold, silver, copper, lead, zinc deposits. Intermittently worked, considered excellent exploration prospects.

H. Carlisle Mine and Ontario Mine of the Steeple Rock District. Gold, silver, copper, lead, zinc deposits. Presently producing, owned by Billingsley.

I. East Camp Mine, Davenport Mine, Golden Nugget Mine, and Golden Rod Mine of the Steeple Rock District. Gold, silver, copper, Lead, zinc deposits. Intermittently worked, East Camp Mine presently in limited production. All considered excellent exploration prospects.

J. Alabama Mine, Mount Royal Mine, and Jim Crow Mine of the Steeple Rock District. Gold, silver, copper, lead, and zinc deposits. Intermittently worked, considered excellent exploration prospects. The 12 mines of the Steeple Rock Mining District (G through J) produced over 10 million dollars of cumulative production (reference 1).

(Table 1 continued)

K. Tyrone Open Pit Copper Orebody owned by Phelps Dodge Corporation, currently in production. Includes over 30 small past producing mines, cumulative production estimated at 80 to 100 million dollars (reference 1).

L. Pinos Altos Copper Orebody owned by Exxon Minerals Corporation, currently in development stage. Past production includes over 30 small mines and over 70 million dollars of cumulative production.

M. Bayard Mines, owner unknown, includes 10 past producing mines. Presently in production. Silver, zinc, lead, copper, iron. Cumulative production is estimated at 10 million dollars (reference 1, et al).

N. Continental Orebody, owned by UV Industries, includes 10 past producing mines. Presently in production. Zinc, iron, lead, copper, silver, gold. Cumulative production is estimated at 40 million dollars.

O. Santa Rita (Chino) Open Pit Copper Orebody owned by Kennecott Copper Corporation, includes over 40 small past producing mines, currently in production, cumulative production estimated at 1 to 2 billion dollars (reference 1).

P. Willis Silica Quarry, owned by O. B. Willis. Currently in production, extracts high grade silica flux for the copper smelter at the Phelps Dodge Corporation, Morenci Branch. In steady production since 1957.

Q. Silver-Gold leaching operation, currently in production. Commenced operations in late-1978. Small mining company.

(Table 1 continued)

Mobile Mineral Belt Influence on RARE II Wilderness Recommendations

(Updated to January 1, 1979, plus new prospects)

㉞ Exploration Prospects

1. Boggs Ranch: Currently an exploration target of Superior Oil Company-Minerals Division and Brigham Young University Development. Potential is considered strong and numerous drill holes will be completed on this target in search for a copper orebody similar to the presently known orebodies of the Safford Mineral Belt.

2. Oliver Mine: Manganese, in Carboniferous limestone (reference 2).

3. Black Rock (Black Magic) Mine: Manganese, in Ordovician Longfellow-limestone (reference 2).

4. Twin Peaks Mine: owned by Frazer-Martin Mines, Ltd. and currently under option by Superior Oil Company-Minerals Division. Cumulative past production estimated at 2 million dollars. Considered a primary copper, gold, silver, lead, zinc, flourspar exploration target within the Morenci-Tyrone Mineral Belt.

5. Twin Peaks South: Staked by Superior Oil Company-Minerals Division and currently being explored. Contains the past producing Norman King Mine which yielded rich amounts of silver, lead, zinc, and copper. Considered an excellent exploration target in the Morenci-Tyrone Mineral Belt.

6. Blue Range-Strayhorse Exploration Target: Exploration program carried out by Phelps Dodge Corporation in 1972 through 1974. Excellent drilling target, copper discovered during drilling, Forest Service delays and interventions caused termination of project. Proved that there is copper potential in the Blue Range-Santa Rita Mineral Belt (reference 3).

7. Blue Range-Toronado Exploration Target: Exploration program carried out by Phelps Dodge Corporation in 1969 and 1970. Data derived from the drilling program stepped up exploration in the Blue Range Primitive Area. Forest Service mandatory delays caused eventual termination of project. Indicated excellent copper mineral potential in the Blue Range-Santa Rita Mineral Belt (reference 3).

8. Superior Oil Company-Minerals Division Exploration Target in 1978: Presently exploring the area. Shows the potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt. The target could have encouraging results.

(Table 1 continued)

9. Blue Range-Hobo Exploration Target: Exploration program carried out by Phelps Dodge Corporation in 1969. Data derived from the drilling program stepped up exploration in the Blue Range Primitive Area. No Forest Service forced delays. Indicated excellent copper mineral potential in the Blue Range-Santa Rita Mineral Belt (reference 3).

10. Conoco Minerals Company Exploration Target in 1977 and 1978: Presently exploring the area. Shows the potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt.

11. AMAX Minerals Company Exploration Target in 1975 and 1976: Indicates the potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt.

12. Ed Stacy Claims: Have been optioned by numerous large exploration corporations including Conoco, AMAX, and Superior Oil Company. Chevron has also shown an interest. Indicates that potential for mineral exploration in the Blue Range-Santa Rita Mineral Belt remains high.

13. Gloria Claims staked by Travis L. Gant and Associates in the Maple Peak Area during August, 1978: Currently planning exploration of the Blue Range. Indicates that mineral exploration companies feel that the potential for mineral exploration and discovery remains high in the Blue Range-Santa Rita Mineral Belt.

14. Mogollon Mines: Currently being investigated by numerous exploration companies. Minerals mined include copper, gold, silver, lead, flourspar, and uranium. Cumulative production estimated at 30 to 40 million dollars (reference 1). Current exploration centers on copper and molybdenum. This area exists at the fringe of the Blue Range-Santa Rita Mineral Belt and may actually expand this mineral belt if exploration is allowed to proceed into the surrounding areas.

15. TE Claims staked by Phelps Dodge Corporation in mid-1978: Shows the continued exploration interest in areas along the Blue Range-Santa Rita Mineral Belt. Exploration is currently underway.

16. Exxon Minerals Company is currently conducting active exploration mineral reconnaissance in the Cliff, New Mexico area for copper and molybdenum. Their exploration approach and theories are based on the completed evaluation of their Pinos Altos Copper Orebody discovery in 1977 and on the projection of the mineral trend from the Santa Rita and Pinos Altos area toward and into the Blue Range (Blue Range-Santa Rita Mineral Belt). They are also actively evaluating the Blue Range at present, although no claims have been staked to date.

(Table 1 continued)

17. Day Mine Prospect being conducted by Towne Mines, Inc.: Included claim staking and exploration drilling in 1974. This indicates the potential for mineral exploration in the Safford Mineral Belt.

18. Markum Wash Project carried out by Phelps Dodge Corporation in 1975: Including claim staking, geologic mapping, exploration drilling, and geophysical surveys. The prospect indicates the continued exploration for mineral deposits in the Safford Mineral Belt.

19. SOL Prospect Exploration Target: A joint venture mineral exploration program carried out by AMAX, Inc., and Phelps Dodge Corporation in 1972 through 1974. In 1975 AMAX continued the exploration program by joint venturing the target with Quintana Minerals. The claims are currently controlled by AMAX, Inc. This prospect indicates the continued search for mineral deposits above the Safford Mineral Belt.

20. Slick Rock Exploration Target staked by Phelps Dodge Corporation in 1974: Exploration drilling, geologic mapping, and geophysics conducted on the prospect. Indicates the continued exploration for mineral deposits along the Safford Mineral Belt.

21. George Stacy Claims: Optioned and exploratory drilled for mineral potential in 1969 by National Lead Corporation with favorable results. Indicates the continued exploration for mineral deposits along the Blue Range-Santa Rita Mineral Belt.

22. Humble Oil-Minerals Division Exploration Target in 1967: Conducted exploration drilling, geologic mapping, geochemistry, and geophysics of the prospect. Shows the potential for mineral exploration at the southern fringe of the Blue Range-Santa Rita Mineral Belt and may actually expand this mineral belt if exploration is allowed to proceed into the surrounding areas.

23. ASARCO, Inc. Exploration Target in mid-1950's: Lead, zinc, flourspar, molybdenum prospect. Drilling exploration program conducted. Numerous old mine workings also present. Past production evident.

24. Phelps Dodge Corporation Gila Claims: Exploration currently in progress with drilling program conducted in November, 1979. Molybdenum-flourspar prospect. Additional exploration work planned. Mineralization projected on surface into the Gila Wilderness.

25. Black Hawk District: Numerous silver-cobalt prospects, previous production. Current active development work by a small Canadian (?) firm.

(Table 1 continued)

26. Cobalt-molybdenum mineralization: Exploration drilling conducted on this prospect in 1971-72 by Cities Service.

27. Porphyry copper-molybdenum mineralization: Drilled in 1972-73 by Exxon Minerals.

28. Porphyry copper-molybdenum prospect: Drilled by Phelps Dodge Corporation in 1972-73.

29. White Signal Uranium prospect: Past production by small mining companies during the 1950's.

30. Kennecott Copper Company prospect: Copper tactites drilled in the 1950's.

31. The Virginia and Pyramid Mines: Copper, gold, silver, lead, zinc. Phelps Dodge Corporation and AMAX, Inc. have conducted exploration drilling projects at this location.

32. Molybdenum prospect: Drilled by AMAX, Inc. in 1979. Additional exploration drilling planned in 1980.

33. Alma prospect: Silver-gold mineralization, mined in the 1880's. Numerous exploration companies currently conducting reconnaissance in the area.

34. White Water Draw prospect: Silver mineralization, mined in the 1880's. Exploration companies currently conducting reconnaissance in the area. Mineralization and host rock similar to Mogollon District to north.

35. Lone Pine prospect: Gold-tellurium mineralization, mined in 1913. Phelps Dodge Corporation is currently conducting exploration drilling in the area. Mineralization-alteration continues into the Gila Wilderness.

36. Black Cat prospect: Manganese mineralization. North-South veins in volcanic rocks.

37. Humble Oil Uranium Prospect: Drilled in 1972-73.

38. San Simon Creek zeolites.

Appendix

Clarification of Photograph Exhibits
referenced to Exhibit F (figure 1).

Outside Sights

The most imposing visual intrusion into the San Francisco Subunit are the five Tailings Ponds or Dams and the so-called "4730" Mine dump located south of the Morenci Open Pit Mine and adjacent to the San Francisco Subunit. Exhibit G is an aerial photograph showing the five tailings dams associated with the Morenci Operation. The tailings ponds appear to some degree to be lakes of blue water from the air. In fact, the tailings ponds contain slurry with chemicals in solution produced in the process of removing copper from the ore. The slurry is piped into the tailings ponds and the heavier, byproduct material falls to the bottom, while some of the water containing the chemicals remains on top. As the tailings ponds get older, the millions of tons of white, sand-like tailings are graded with heavy earth moving equipment and bulldozers. The tailings dams continue to rise at the rate of 20 to 60 feet per year. This white, sand-like tailing material, because of its color and the fact that it does not support vegetation is clearly visible for miles -- well within the existing boundaries of the San Francisco Subunit.

Exhibit G shows the two Southwest Tailings Dams which are closest to the northern boundary of the Subunit. These tailings dams are clearly visible within most of the San Francisco Subunit. *See* Exhibits H & I. Moreover, as time passes, the Southwest Tailings Dams will rise to an ultimate height of 800 feet at a planned elevation of 4,400 feet. See Exhibit F (figure 1) which shows eventual size of both Southwest Tailings Dams.

Exhibit G shows the East Tailing Dam and West Tailing Dam stacked high with white tailing. The Southwest Tailings Dams will take on more and more of this character with each passing day and year. The southernmost tip of the southwestern tailings dams is located within 1000 feet or 330 yards of the San Francisco Subunit. *See* Exhibit F (figure 1). There is an overwhelming visual impact of existing Phelps Dodge Morenci Operations within the existing or revised boundaries of the San Francisco Subunit.

Exhibit J (as shown on the Exhibit F (figure 1)) is a color copy of a photograph taken nearly one mile within the northern boundary of the revised Subunit. At this place the Subunit is exactly two miles wide. Land over one mile south of the spot at which the Exhibit J photograph was taken has already been eliminated from the San Francisco Subunit at the direction of IBLA and the Acting Arizona State Director because of the overwhelming impacts of the sights and sounds of the Phelps Dodge operation approximately 2 miles to the north. As shown by the labels on the Exhibit J photograph, one can clearly see the "4730" Mine Dump (Point A), smoke from the two large Morenci Smelter smoke stacks (Point B), and the West Tailing Dam System (Point C) from within the San Francisco Subunit. The overlay shows the ultimate configuration to be achieved by the on-going process of constructing and developing the Southwest and Silver Basin Tailing Dams Systems as viewed from within the Subunit. The visual impact of the Phelps Dodge operation from this point is easily equal to, if not more imposing than, the impact experienced one mile to the south on ground eliminated from the Subunit at the direction of IBLA. The Exhibit F (figure 1) shows that the elevation of the upland ground at the point from which the Exhibit J photograph was taken is equal to the elevation of the eliminated ground to the south -- 4,000 feet and higher. The Exhibit J ground is *equal* in elevation and *closer* to the Phelps Dodge operations than land eliminated from the Subunit over one mile to the south. Yet the Exhibit J land was not eliminated from the San Francisco Subunit.

Exhibit H (as shown on the Exhibit F (figure 1)) is a photograph taken approximately 2/3 of a mile south of the northern boundary of the revised Subunit. At this place the Subunit is approximately 1-1/2 miles wide. Land approximately one mile south of the spot at which the Exhibit H photograph was taken has already been eliminated from the San Francisco Subunit at the direction of IBLA and the Acting Arizona Director. As shown by the labels on Exhibit H one can clearly see the Phelps Dodge tailings dams service roads (Points A & E), Morenci Smelter emissions (Point B), heavy equipment constructing and maintaining the Southwest Tailing Dam System (Point C), the West Tailing Dam (Point D), and the East Morenci Plantsite (Point D) from within the San Francisco Subunit. The overlay shows the ultimate configuration to be achieved by the on-going process of constructing and developing the Southwest Tailing Dam System. The visual impact of the Phelps Dodge operation from this point is easily equal to, if not more imposing than the impact experienced approximately one mile to the south on ground eliminated from the Subunit at the direction of IBLA. The Exhibit F (figure 1) shows that the elevation of the upland ground at the point from which the Exhibit H photograph was taken is equal to the elevation of the eliminated ground to the south -- 3,600 feet and higher. The Exhibit H ground is *equal* in elevation and *closer* to the Phelps Dodge operations than land eliminated from the Subunit approximately one mile to the south. Yet the Exhibit H land was not eliminated from the Subunit.

Exhibit I (as shown on the Exhibit F (figure 1)) is a photograph taken approximately 1/2 mile south of the northern boundary of the Subunit. Land to the south and southeast of the place at which the Exhibit I photograph was taken has been eliminated from the San Francisco Subunit at and below the 2,600 feet elevation level. The Exhibit I photograph was taken just below the 3,600 feet elevation level. As shown by the labels on Exhibit I one can clearly see the Phelps Dodge service roads (Point A), power lines (Point B & C), West Tailing Dam (Point D), Southwest Tailing Dam System (Point B) and "gravel pit" for the Southwest Tailing Dam System (Point B) from within the San Francisco Subunit. The overlay shows the ultimate configuration to be achieved by the on-going process of constructing and developing the Southwest and West Tailings Dam Systems.[5] The visual impact of the Phelps Dodge operation from this point is easily equal to if not more imposing than the impact experienced at the ssame elevation approximately one to two miles to the south and southeast on ground eliminated from the Subunit at the direction fo IBLA. Yet this area was not eliminated from the Subunit.

The foregoing evidence clearly establishes that the decision of the Acting State Director of December 30, 1982 failed to eliminate ground from the San Francisco Subunit which possesses overwhelming visual intrusions equal to if not more imposing than those experienced on ground actually eliminated from the Subunit.

Outside Sounds

In addition to outside sights of the adjacent Phelps Dodge Morenci operations, overwhelming sounds of this large operation also permeate the entire San Francisco Subunit.

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[5] The development and continuous growth of the Phelps Dodge, Morenci Mine Dumps, Tailings Ponds, and general operations is clearly an ongoing process which should be presently considered during the inventory phase of the Gila Box Wilderness Intensive Inventory Unit. *See Kennecott Corp.*, 66 IBLA 249, 256 (1982); *Union Oil Co.*, 58 IBLA 166, 170 (1981).

For example, the Tailings Dams System is that portion of the Morenci operation situated closest to the northern boundary of the Subunit. See Exhibit F (figure 1). This tailings dams system receives 100,000 tons of slurry or tailing daily as part of the copper mining process. Dams must be continually constructed by use of heavy industrial equipment. Therefore, Phelps Dodge presently utilizes and will utilize D-9 bulldozers, earth movers, water trucks, and scrapers during about 70% of each year to construct, enlarge and maintain the Southwest Tailings Dam System alone. This heavy industrial equipment will be utilized constantly on the Southwest Tailings Dam System alone to the year 2020 and beyond.

The service roads used to maintain the tailings dams are located between the tailings dams and the northern boundary of the Subunit. See Exhibit F (figure 1). These roads along which heavy trucks, earth movers, and bulldozers travel constantly are located literally within a few hundred yards of the northern boundary of the Subunit. See Exhibit F (figure 1). The roaring engines and sounds of the earth movers and bulldozers used to construct tailings dams, move pipeline, maintain service roads, and drill observation wells are clearly audible for miles -- throughout the Subunit.

The San Francisco Subunit itself is a narrow finger or projection out from the body of the rest of the Gila Box Wilderness Study Area. This entire Subunit or projection is only one mile to two miles in width. See Exhibit F (figure 1). The small size of the Subunit coupled with the fact that it is sparsely vegetated desert land leads to the result that industrial sounds from the adjacent Phelps Dodge Operation permeate the entire area.

RESPONSE — LETTER 113

* Three figures and eight exhibits were included with this letter. They have not been reproduced in this document but are available for inspection at the Safford District Office.

** The comments and statements previously submitted are not reproduced in this document. This material was submitted at various stages of the inventory process and responded to at that time. It is available for inspection at the Safford District Office.

113-1 The Wilderness Management Policy (See Appendix No. 2) states that BLM will manage air quality in designated wilderness areas as Class II unless reclassified by the State of Arizona as a result of the procedures prescribed in the Clean Air Act. The management policy also states no buffer zones will be created around wilderness areas to protect them from the influence of activities on adjacent lands.

113-2 The BLM acknowledges the presence of porphyry copper districts at Safford and Morenci and this information was not treated lightly in its analysis. (See text Chapters 3 and 4.)

113-3 The Wilderness Management Policy (See Appendix No. 2) states that landowners of property completely surrounded by a wilderness area (inholdings) shall be given such rights as may be necessary to assure adequate access to their land. Adequate access is defined as the combination of routes and modes of travel which will, as determined by BLM, cause the least lasting impact on the wilderness resource, and at the same time serve the reasonable purposes for which the inholding is held or used. In every case, this may not necessarily result in vehicular access.

114

GRAHAM COUNTY BOARD OF SUPERVISORS
GRAHAM COUNTY COURTHOUSE · 800 MAIN STREET · PHONE 428-3250
SAFFORD, ARIZONA 85546

SUPERVISORS
DR. HUGH HAMMAN, CHAIRMAN
DELBERT HOUSEHOLDER, MEMBER
DALE OLSEN, MEMBER

H. C. GIETZ, COUNTY MANAGER
BARBARA FELIX, CLERK

August 29, 1983

Lester Rosenkrance, District Manager
Bureau of Land Management
Safford District
425 E. 4th St.
Safford, Arizona 85546

RE: Area 4-8 Black Rock of EIS

Dear Mr. Rosenkrance:

The Graham County Board of Supervisors has studied the Safford District Draft Wilderness Environmental Impact Statement for the Wilderness Study Area which was published in June for our section of the State.

We have several concerns regarding the designation of the Black Rock area of this study being recommended as a wilderness area.

This site is very remote and currently only approachable through the San Carlos Indian Reservation, which we feel would cause some problems.

114-1 Our experience with an area being designated as "wilderness", i.e. the Aravaipa Canyon in Klondyke, has caused a large increase in visitors thus requiring additional county highway maintenance and increases in necessary law enforcement because of the type of people who remain in the area. We feel this to be a distinct possibility in the Black Rock area.

114-2 We feel it is necessary and most desireable to provide for multiple use of an area, but wilderness consideration and designation will eliminate vehicular access, adversely affecting hunters, fishermen and recreational vehicle users who strongly favor free access to this area.

114-3 Finally we feel wilderness designation would have some effect on the economy of Graham County by the reduction of livestock sales.

Sincerely,

GRAHAM COUNTY BOARD OF SUPERVISORS

Hugh G. Hamman, Chairman

HGH:bf

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

RESPONSE — LETTER 114

114-1 Designation of Black Rock as wilderness could lead to increases in visitor use. It is difficult to project whether use will increase and if it does, how much. Visitor use depends on several variables but the nearness of the wilderness area to major population centers and uniqueness of the wilderness resource are prime factors in whether use levels are expected to increase significantly. The potential for increases in visitor use does exist and if visitor-related problems result, the Bureau will adjust its management to correct the problems.

114-2 See Response 87-2.

114-3 See Response 16-2.

115

GRAHAM COUNTY BOARD OF SUPERVISORS
GRAHAM COUNTY COURTHOUSE · 800 MAIN STREET · PHONE 428-3250
SAFFORD, ARIZONA 85546

SUPERVISORS
DR HUGH HAMMAN, CHAIRMAN
DELBERT HOUSEHOLDER, MEMBER
DALE OLSEN, MEMBER

H C GIETZ, COUNTY MANAGER
BARBARA FELIX, CLERK

August 29, 1983

Lester Rosenkrance, District Manager
Bureau of Land Management
Safford District
425 E. 4th St.
Safford, Arizona 85546

RE: Draft Wilderness Environmental Impact Statement

Dear Mr. Rosenkrance:

The Graham County Board of Supervisor and people of Graham County support and fully agree with the BLM proposal to leave the Gila Box unit in its current multiple use classification and not recommend it to be classified as wilderness.

This area has been properly managed by the Bureau and we appreciate your intense study upon which your decision was made.

Sincerely,

GRAHAM COUNTY BOARD OF SUPERVISORS

Hugh G. Hammah, Chairman

HGH:bf

AN EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION EMPLOYER

116

6103 North 19th Avenue
Phoenix, Arizona 85015

August 29, 1983

EIS Team Leader
Safford District Office
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

I wish to give my opinion of the Gila Box WSA wilderness designation.

I feel that this would be an important area for designation, particularly because of the area's naturally flowing rivers. There is little enough riparian habitat left in this state and in the west, so I feel that the areas we have left should be protected as stringently as possible.

I am definitely for wilderness designation of some sort if this is what it takes to protect Gila Box WSA's fabulous wildlife, habitat, and scenic values.

Sincerely,

Ellen Calabro

Ellen Calabro

117

To: Les Rosenkrance
Safford District Manager, BLM
425 E. 4th Street
Safford, Arizona 85546

Aug. 1983

I am a resident of Arizona and I am writing to you to express my support for the Gila Box area of 17,831 acres to be designated as a wilderness area. There are many reasons for this designation, biological, ecological, historical and human.

117-1 I wish to address the issue of ORV use and the ecological and biological impact on the area. With so much of the surrounding area available to ORV use it doesn't seem necessary to destroy this small area. It has been studied and documented by biologists and the Audubon Society that ORV use in the area is endangering the future of the Black Hawk, Golden Eagle and Southern Bald Eagle because of noise from the vehicles and desrtuction of cottonwood seedlings. This is an important and significant area to preserve for the future. I feel that as Arizonans we can be a model for others who have the same concerns for important natural areas by designating the Gila Box 17,831 acres as wilderness.

Sincerely,

Norma B Carlson
6608 Paseo San Andres
Tucson, Az 85710

RESPONSE — LETTER 117

117-1 See Response 1-2.

118

417 E. Cornell Dr.
Tempe, Az 85283
Aug. 28, 1983

District Manager
Bureau of Land Management
425 E. 4th St.
Safford, AZ 85546

Dear Sir:

I submitted testimony at the July 21 Phoenix hearing on the Safford District and wish to supplement my testimony with this letter.

118-1 I am very concerned that the mineral interests in this state do not take precedence over other interests such as areas proposed for wilderness. Provision is given in the Federal Wilderness Act to permit the appropriate governing authorities to allow mining in wilderness if it is determined to be in the best interests of the country. Therefore areas qualifying for wilderness status should receive that protection if we the public want it despite assumptions about potential mineral values within them.

Also geothermal resources should be ignored if they are in our proposed wilderness areas because there have been multiple such resource areas identified in other areas and they have not been developed. There is no reason to think these in the wilderness-type areas would be developed first so it follows that we should protect these geothermal areas as some remaining natural. Leave to the developers those outside proposed wilderness spots. And should geothermal development be proposed at a later date within wilderness areas perhaps the technology and science involved will know more about preventing such development from destroying water sources for miles around. Water is too valuable a resource in Arizona for a destructive development like geothermal penetration to waste it or rob us of it.

Many experts in Arizona such as economists, mining engineers, big business and others even closer to the mining industry this year examined state mining business prspects for the future. Their conclusions are all the same: the future of mining in Arizona is bleak. The troubles which Phelps Dodge has for example are leaving it very weak nationally. Since use of copper is declining worldwide and 90% of this company's income is from copper it is struggling to diversify and decrease its reliance on copper. Their primary exploratory activities are overseas, not here or in the United States! And they are exploring for other precious metals, not copper. The United States no longer controls the world copper market and indeed, the Feds here even sent billions to foreign countries to

p. 2
Cosaboom

118-2 bolster their economies because foreign copper prices are down! This leads me to propose that the parcel of patented land held by Phelps Dodge which extends into the proposed Gila Box area could be easily traded off. It would seem a certainty that they would eagerly take a trade for some other land, or perhaps even a tax write-off and donate the land to the cause of Conservation. I suggest BLM propose this to Phelps Dodge to expand the Gila Box area and increase its value as wilderness.

The declining mining of copper in our state is also going to proportionately reduce the production of other minerals which are byproducts of copper mining. Gold, silver, molybdenum, lead and zinc production will decrease also. Mining solely for these is too expensive and so they have prospered as long as they were mined as byproducts of copper mining. As one expert wrote recently, copper is the mainstay of the Arizona minerals industry. As the demand for copper declines worldwide, copper mining in other parts of the country has declined, thereby increasing Arizona's share of copper mined in the United States. This is a one way road to disaster for the mines in Arizona. While this should concern us regarding Arizona's economy, mining potential should hold no threat for wilderness areas since existing mines can't make it economically.

In closing I ask BLM to remember it is a conservator of the public lands and we of the public are being reasonable in asking that a small portion be held in trust for all of mankind. Hold it in wilderness status--all of the Safford District areas considered which contain riparian areas which includes Needles Eye, Black Rock, Fishhooks, Happy Camp Canyon, Day Mine, Gila Box and Turtle Mountain. Allow us who are conservation minded to have these irreplaceable areas preserved that they will maintain essential ecological processes and life support systems, will preserve genetic diversity and will ensure the sustainable utilization of species and ecosystems.

Most sincerely,
Mary E. Cosaboom
Mary E. Cosaboom,
Sierra Club
Audubon Society
Wilderness Society

RESPONSE — LETTER 118

118-1 The purpose of the BLM wilderness study process is to determine the suitability of an area for preservation as wilderness. The district will recommend for wilderness designation only those areas where it has been determined, through the multiple resource planning process and public involvement, that wilderness is the most appropriate use of the land and its resources. In making these determinations, BLM must ensure they are based on consideration of the other multiple resource values of the study area. The BLM cannot ignore the potential or existing mineral and energy values of an area.

118-2 District-wide land ownership pattern adjustments are in progress. Eagle Creek is a piece of property BLM has been interested in for a long time. If Phelps Dodge wanted to dispose of the property, BLM would be interested in discussing the possibility of bringing it into public ownership because of its high resource values.

119

2637 North Palo Verde
Tucson, Arizona 85716

Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

August 27, 1983

Dear Mr Rosenkrance,

Thank you for the copy of the Safford District's Draft Wilderness Environmental Impact Statement, and your request for comments. I would like to comment on the two Wilderness Study Areas with which I am most familiar: the Needle's Eye, (#4-1A), and the Gila Box, (#4-22/23/24(A).

I have spent some time backpacking in the Needle's Eye WSA, and greatly appreciate its beauty and wilderness qualities, revealed both in the rugged Mescal Mountains, and the cool green canyon of Mescal Creek. I was initially concerned about the presence of the powerline in the WSA, but visiting the area in person showed me that the topography is so rugged that the powerline is rarely visible, and does not significantly detract from the area's wilderness value. I therefore heartily applaud and endorse the BLM's proposal to designate most of the WSA as Wilderness.

On the other hand, I was both surprised and appalled to read the BLM's "No Wilderness" recommendation for the Gila Box. I personally support full wilderness designation for the entire 17,831 acres of the WSA, for the following reasons.

119-1 This area is extremely valuable and worthy of preservation because of its unique riparian environment and ecology, caused by the presence of one of the very few perennial streams in Southeastern Arizona. The continued uncontrolled and uncontrollable ORV use of the area poses a grave threat both to the riparian vegetation and to the local populations of rare and endangered bird species, including Black Hawks and Peregrine Falcons, that are found in the area.

Wilderness designation would both put an end to the destructive effects of ORV traffic, and encourage increased use of the area by hikers and backpackers. The public demand for increased opportunities for hiking in quiet, secluded riparian areas is made obvious by the popularity of Aravaipa Canyon, where reservations are often needed months in advance.

Today we have a chance to preserve the Gila Box, a very special part of Southern Arizona, for future generations, and I strongly urge the BLM to take this opportunity.

Sincerely,

H. J. Turin

H.J. (Jake) Turin

RESPONSE — LETTER 119

119-1 See Response 1-2

120

Defenders OF WILDLIFE

Aug 29, 1983
13795 N Como
Tucson, Az 85741

District Manager
BLM
425 E 4th St
Safford, Az 85546

Dear Sir;

As the southwest representative for Defenders of Wildlife, I am offering the following comments on the Safford District Wilderness D.E.I.S.

Defenders finds the Proposed Action of designation of only 34,881 acres of only 4 of the 9 WSA's to be far smaller than we would like. We urge that the BLM consider the Enhanced Wilderness Alternative, instead of the present P.A.

In particular, we are in disagreement with the decision to delete all of the Gila Box WSA from consideration for wilderness. This WSA is one of the most deserving areas in the state for wilderness protection.

Thank you for considering our comments.

Sincerely,

Steve Johnson

Defenders of Wildlife
Southwest Rep.

121

Eugene R. Etter
1115 1st Avenue
Safford, AZ 85546

August 29, 1983

Mr. Lester Rosenkrance, District Manager
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

After reading in the August 24, 1983 Eastern Arizona Courier of the push by environmentalists to have BLM change the proposed designation of the Gila Box and Turtle Mountain study areas to wilderness, I felt that it is time to add my voice of approval to those that agree with the multiple use designation recommended by BLM.

The area has been experiencing multiple use for many years and the rivers with their periodic floods have managed to retain the natural beauty of the area. Thus each trip through the canyons gives one the feeling of being the first to visit the area. A designation of wilderness would not improve this one iota, but would make it far more difficult to experience by most individuals.

Therefore, I feel your designation of multiple use to be the only logical and acceptable use for the two areas.

Sincerely yours,

Eugene R. Etter

Eugene R. Etter

122

WALTER R. SPOFFORD

RANCHO—AGUILA
P.O. BOX J
PORTAL, ARIZONA 85632

27 August, 1983

DISTRICT MANAGER,
Bureau of Land Management,
425 East 4th. Street,
Safford, AZ., 85546

Dear Sir:

This letter is inregard to the 17,831 acre GILA BOX WILDERNESS. I strongly support Wilderness designation for this tract of 17,831 acres enclosing the Gila Box section of the Gila River.

This region is in one of the outstanding wildlife regions of Arizona. The Gila Box includes the outflow of Eagle Creek, which include not only a remarkable bat cave, but also a remarkable concentration of such raptors as Black Hawk (several nesting pairs)...I have not found Gray Hawk here but it is potentially if not actually a nesting location for this rare hawk. Cooper's Hawks, Red-tailed Hawks, Zone-tailed Hawks, Golden Eagles, and even the rare and endangered Peregrine Falcon is to be found just north of the Box in the Eagle Creek watershed.

During the winter, a number of Bald Eagles spend several months along the Eagle Creek, and I have not noted them in the 'Box', but I suspect they do use this area as well.

Flowing water and live Cottonwood stands are wonderful wildlife habitats, ...and Arizona is rapidly yielding her resources to the demands of exploitation.

The GILA BOX should be declared a WILDERNESS for the benefit of its wildlife and wildlife potential...it should not be sacrificed to either r recreational or commercial exploitation.

Sincerely yours,

Walter R. Spofford

Walter R. Spofford.

100% RECYCLED PAPER

123

2391 W Rapallo Way
Tucson, Arizona 85741
August 28, 1983

District Manager, BLM
425 E 4th Street
Safford, Arizona 85546

Dear Sir:

I would like to express my support for the designation of 17,831 acres known as the Gila Box as wilderness. There are many reasons to designate the Gila Box as wilderness. Two of the most important are:

- The quality of the Gila Box as a riparian environment

- The opportunity for solitude and primitive recreation, particularily river running

To quote a study by Nicholas Van Pelt, "The Gila Box and and it's tributaries comprise an exceptional wildlife area because of topography, lack of development and permanent water." Since only .003% of Arizona's lands are riparian and only 15% of that remains in a natural riparian state, it is very important to retain those few remaining areas in that natural state. As a birdwatcher, I am continually amazed at the number and variety of species in Southern Arizona, particularily in the riparian areas. The Gila Box with it's permanent water, trees, cliffs, and lack of development is one of the areas where this diversity still exists. It is especially important for raptors such as the Black Hawk. It also supports more than 30 species of reptiles and amphibians and 15 species of fish as well as mixed Sonoran and Chihuahuan vegetation.

I have been involved in various forms of wilderness water recreation for over 20 years. The Gila Box has the characteristics that make this type of recreation special - lack of development, extensive and varied wildlife, fascinating geology, and moving water. This type of recreation usually has a minimal impact on areas such as the Gila Box. It should continue as a low impact user of this area because of skill, equipment, and water-level requirements.

Two major current users of the Gila Box are grazing and ORV recreation. Although Van Pelt's study concluded that neither of these uses has altered the area, their continuation could easily have a major detrimental impact on the Gila Box. A few examples of this potential for deterioration are:

- One of the striking things I have noticed while driving through Arizona is the decrease in quantity, quality and variety of vegetation in many areas between the ungrazed roadsides and the overgrazed areas beyond the bordering fences.

- When cattle are allowed to graze in riparian areas, they frequently eat, or otherwise destroy, the majority of young trees along the river bank. This leads to a situation where only the mature trees remain. When these die, there are no are no replacements. In an area such as the Gila Box where birds, especially raptors, and other wildlife depend on these trees and the trees are an essential part of the environment, the maintenance of an age distribution in the tree population is critical.

- I live in a recently developed area of Tucson, and, while there was no ORV use as such, those areas the developer used as "informal roads" are still almost completely devoid of vegetation and have been eroded more than adjacent areas.

- In the past year, I have observed the effect of a few neighborhood motorcycles and 3-wheeled vehicles on the area. There is no vegetation in the churned and rutted tracks they leave behind. There is also a decrease in the amount and variety of wildlife.

There are many areas of Arizona suitable for grazing and/or ORV recreation. The Gila Box is not essential for either of these uses. The Gila Box is an important example of a rare and vanishing segment of Arizona - ecologically stable riparian habitat. It is a part of Arizona's heritage that deserves protection. At this time wilderness status is the most effective way to provide that protection. I urge you to provide it.

Sincerely yours,

Cm Clark

C. M. Clark

Dear Sir: **124**

Having read the D.W.E.I.S. for the Safford District, I would just like to give my comments on the issue.

As an avid nature lover of the outdoors, I try to get out into nature as much as possible, whether just tubing down the Salt River or camping in a National Forest, the feeling of getting away from it all is important.

I think making some parts of the state a Wilderness Area is very important. Though I have not been fortunate to visit the proposed areas in this E.I.S. I am sure they would be welcome additions to the National Wilderness Preservation System.

Hopefully, I will be able to see these areas for myself this fall, knowing that if included in the System, I will be able to come back anytime and they will always be the same.

The following is my suggestions for action on the W.S.A.'s in the Safford District

Enhanced Wilderness —

Peloncillo Mts., Javelina Peak, Turtle Mt. and Day Mine.

Moderate Wilderness — Proposed Action
Needles Eye, Black Rock, Fishhooks, Gila Box & Happy Camp Canyon.

These actions would further ensure the preservations of these areas as a place where we could all enjoy the "Wilderness Experience So we must act now to protect some of what we have now before it's to late.

Thank you,
Sincerely
John Rampini

125

August 24, 1983

To: Les Rosenkrance
Safford District Manager, BLM
425 E. 4th Street
Safford, Arizona 85546

I have been down the Gila River, have rafted other rivers and explored many undisturbed natural areas in the West. I have many concerns regarding the Gila Box Area and believe it too should be left undisturbed and the 17,831 acres be designated Wilderness. I am not a scientist but am aware of the numerous biological and ecological concerns of the scientific community for preserving this area. It has been studied and documented by many people more knowledgeable than I, therefore I wish to address humanistic concerns for the area.

Because of extensive travel thoughout the United States, I believe the Gila Box is a unique area to the West. The Gila River is the last free-flowing river in Arizona and one of the few rivers in the West that is gentle and easy to raft. It is characteristic of most Western rivers, because of heavy mountain run-off and dramatic elevation drop to be rough and many times raging rivers. This quality allows accessibility only to the hearty - the courageous and strong. The Gila, because of its gentle natureis accessible to anyone wishing to have a wilderness experience - young, old and handicapped. If the only rivers protected are of the nature and reputation of the Colorado, than a great number of people will be excluded from having this remarkable wilderness experience.

The Gila Box is a living laboratory for school children, because of its easy access, educational trips have been through the area and have seen it in its natural state. This type of educational experience for the young is important for their understanding and knowledge of biology and ecology so they as tomorrow's law makers will have the knowledge and experience in which to make future decisions concerning the enviornment, with care.

125-1 Of additional concern is the use of ORVs in the designated 17,831 acres. At present ORVs may use 99% of the management area for their form of recreational use, excluding a significant group of people who wish to experience the Gila Box as it is, without the noise and damage present and future of ORVs. This group of people (artists, backpackers, bird watchers, educational groups, etc.) should not be excluded from experiencing the area in their own personal way, not only during the Spring when the Gila River is running, but throughout the year. 17,831 acres is a very small amount of the total management area to set aside for those of us wishing to experience the Gila Box in our own way and to preserve a critical natural enviornment.

Lastly of concern is the future - a future you and I have control over but may not be apart of. It deals with short term decisions vs long term forthsight. There is no way for us to know exactly what the next quarter of half century will bring to Arizona. We can pretty assuredly count on more people and with that numerous impacts on our enviornment. If the Black Hawks are gone, if the Golden **and Bald Eagles** are gone, if certain reptiles are gone, if the vegitation distinctive of the Sonoran and Chihuahuan Desert are gone, how will the future Arizonans experience the wilderness as we know it now? It seems rather selfish to me that we have it all and future generations may never see the beauties of our state. Shall the Gila Box area become extinct in modern times because of our short sightedness? When we talk of our wonderful experiences in the wilderness to our Grandchildren will they have to experience it through picture books? The peace of mind, the sense of contentment with the world, that the wilderness brings should not just be a priveldge for us today.

I believe the only way to preserve the 17,831 acres of the Gila Box as a Wilderness area is to put it to Federal Legislation. Local authorities do not have the resources necessary to them, nor the resistance capabilities to people with less vision for the future.

Sincerely,

Sandra Pederson

Sandra Pederson
1439 S. Jones # D-9
Tucson, Arizona 85713

RESPONSE — LETTER 125

125-1 See Response 1-2.

126

Aug 27, 1983

District Manager
Bureau of Land Management
425 E 4th St
Safford Az 85546

Dear Sir:

With the present administration in power we believe that the all wilderness alternative is the only safe one - what we save will remain secure for us but what is damaged is gone forever and we cannot afford to lose more. Reagan & Watt claim to be friends of the environment but with friends like that who needs enemies

Yours
truly
Ethel W Thornley

ETHEL W THORNILEY
18653 SCHOENHERR
DETROIT MI 48205

DISTRICT MANAGER
BUREAU OF LAND MANAGEMENT
425 East 4th Street
Safford, Arizona 85446

127

* We, the undersigned residents of Greenlee County, Arizona support the recommendation of the Safford District Bureau of Land Management Director to maintain multiple use of the Gila Box and Turtle Mountain Wilderness Study Area Units. We agree that these areas do not meet the criteria for inclusion into the wilderness system and that wilderness designation would be detrimental to Greenlee County and its citizenry. We feel that these areas should be managed for multiple use to obtain the best mix of recreation, ranching, flood control and other uses.

NAME	ADDRESS
Deana S. Cocks	Rt 1 Box 41, Clifton AZ
Sue Patterson	Box 908, Morenci AZ
Louise Cochran	101 Ironwood Morenci Az 85540
W.A. Cochran	101 " " " 85540
Jerry C. Williams	131 COPPER ROAD, MORENCI, AZ
[illegible]	106 GREASEWOOD - MORENCI ARIZ
Gloria Ortiz	98 Catclaw - Morenci
Tony Enrico	100 Ironwood - Morenci, Az
[illegible]	115 Ironwood Morenci Az
[illegible]	130 Copper Rd. Morenci Az
Elida Valenzuela	170 Cholla St - Morenci
Stephen T. [illegible]	130 Copper Road Morenci Az 85540
[illegible] Williams	131 Copper Road Morenci 85540
Gay Burgher	P.O. BOX 1186, MORENCI 85540
Dorothy Richardson	Rt 2 Box 227 Duncan Az 85534
Carol A. Jolley	Box 435 Morenci Az 85540
Tina Vasquez	Box 339 Morenci 85540
Gloria Sierra	136 Mariposa Morenci 85540
Sallie Sanchez	Box 896 Morenci
Nellie V. Garcia	Box 162 Morenci
Manuel R. Garcia	Box 162 Morenci
Helen J. Cooper	105 Poplar St Morenci 85540
Jackie H. Cooper	105 Poplar St. Morenci 85540
Marilynn Dee Thomas	Box 1311 Clifton Az 85533
[illegible] Thomas	Box 1311 Clifton, Az. 85533
Tonya L. Williams	Box 85 Morenci
Sheila A. Pawlowski	127 Copper Rd. Morenci, AZ 85540

*This petition was signed by 279 residents of Graham and Greenlee Counties. All signatures have not been reproduced in this document. They are available for inspection at the Safford District office.

128

August 28, 1983
3205 North Riverbend Circle
Tucson, Arizona 85715

District Manager, BLM
425 East Fourth Street
Safford, Arizona 85546

Dear Sir,

We wish to register our support for wilderness status for 17,831 acres of the Gila Box. We took advantage of a raft trip in March of 1982. Our interest was to take a short trip through country that was new to us but not too difficult. We were both impressed with the solitude, scenery, bird life and geological formations. In our view it is unique enough to preserve. A two day trip has very special memories for us. Surely, there must be many others like ourselves, who for various reasons do not make longer or more arduous river trips, who should have the chance to see that short stretch of the Gila unchanged.

We are of the segment of people who belong to no special interest group and have never been moved to write such a letter of support.

Yours sincerely,

Keith K. Larson
Esther C. Larson

129

UPPER GILA RIVER ASSOCIATION
UGRA
P.O. BOX 1449
SAFFORD, ARIZONA 85546

8/31/84

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th St.
Safford, Az. 85546

Dear Mr. Rosenkrance:

Kenyon Udall, UGRA chairman, has already expressed the appreciation of our 400 members for your recommending that the Camelsback Area not be incorporated into a Wilderness. I would like to add some personal observations gathered from my work on the flood control problems along the upper Gila River.

129-1 First, it is very important that the Camelsback Site be kept free in case the studies of the U. S. Corps of Engineers and the Bureau of Reclamation decide some kind of flood control structure should be erected there. The fact that the people of the Upper Gila have been working seriously for such protection since 1930 should always be given priority over any subsequent proposals.

Second: Controlling the flood run-off of the Upper Gila is of great importance economically and ecologically to many people.

A. The "big" floods take out permanently 3,000 acres of prime farm land, mostly in Graham County. In addition, several thousand acres that are flooded cost the farmer more than $1,000 per acre to restore it to production--not counting the loss from the flood.

B. This 3,000 acres--ten feet deep--is carried down-stream in the form of silt and shortens the life of the San Carlos Reservoir Irrigation project. By erecting flood control structures at Camelsback, Quail Spring and Conner sites, this type of erosion can be eliminated, thereby prolonging the life of the San Carlos Reservoir for many years.

C. By eliminating the devastating flooding, and by permitting theflood water to go down stream gradually, the channel of the Upper Gila can be stabalized, the carving up of farms and bridges stopped, and we will see a beautiful stream emerge with "fishing holes", beautiful tree growth along the stream, thereby creating a fine habitat for many birds and small animals.

I don't believe any member of UGRA would like to see any of the "Wilderness assets" of the Camelsback area destroyed. I think the BLM has enough authority to preserve this wonderful area for future generations, while at the same time allowing multiple use of its natural resources.

Sincerely
Glenn Burgess, Secretary

RESPONSE — LETTER 129

129-1 See Response 4-1.

130

District Manager, Bureau of Land Management
425 E. 4th St.
Safford, Az. 85546

8/29/83

Ref. 8500: Safford District Draft Wilderness EIS

The Huachuca Audubon Society strongly supports the All Wilderness alternative. In fact, it appears that optimum use of land under BLM jurisdiction would probably call for a much larger portion being assigned to wilderness at this time.

The objective of our stewardship of this land, as of any land, should be to get the greatest good we can out of it for the people of the US consistent with turning it over to our successors in stewardship in at least as good condition as we received it and with the resources it contains intact or improved. For many nonrenewable resources this can be done with systems of recycling. For others, like fossil fuels, the quality of life can be maintained only thru plans for reducing population and/or adjusting our lifestyles as they run out.

Land under BLM jurisdiction contributes to the quality of life by furnishing fuel wood, timber, grazing, other raw materials, a space for natural ecosystems to survive, a large portion of our water, many opportunities for recreation, many useful minerals, and probably other useful items and by preserving the record of past life and geological processes. The ecosystems that BLM and others preserve make oxygen, purify air and water, prevent floods, return pure water to acquifers, build topsoil, prevent soil erosion, are the source of renewal of the gene pools of our cultivated plants and domestic animals, are the source of our biological (including medical) knowledge (except what we get from ourselves), and furnish food, medicines, and many industrial raw materials. To enable the ecosystems to do these things well we must preserve them in a natural state and ensure that no species is lost if the loss can be prevented.

Perhaps the chief goal of land management in the arid Southwest should be to return the maximum amount of pure water to acquifers. This is best done by building a strong root structure and thick humus in the soil. This is probably better done in wilderness than otherwise.

Wilderness also best provides a healthy ecosystem (with all the benefits listed above) and protection for endangered species, which may contain valuable knowledge and other resources that we may need some day.

Wilderness enhances the opportunities to enjoy the nondestructive types of recreation. Destructive recreation can be enjoyed in relatively small areas where reuse will concentrate the destruction. Campgrounds and ORVing fall into this category. Society in general and our public land managers in particular must move to curb the destructive effects of ORVing and its interferrence with the right of others to also enjoy our land.

Wilderness is probably the best way to preserve what remains of the biological and geological history of the earth.

Wilderness is probably the best way to build topsoil, prevent soil erosion, and control floods.

The only better way to achieve some of the above goals would be to prohibit entry entirely. This might be desireable in special cases but would not generally seem to be optimal land use.

If some land is particularly good for producing fuel wood, timber, forage, or other renewable economic resources then it should be considered for those uses if it has no recreation, water, soil, and ecosystem conservation values. In cases of conflict between these two groups, then in southeast Arizona preference whould be given to the latter but with the land managed to yield as much of the products of the first group as the situation permits. This probably can not best be done as wilderness.

In no case should the economic uses mentioned in the preceding paragraph be subsidized as is now done. A free enterprize system can not work that way, and it is not fair to us owners of the land to have to give up its use and subsidize the user, too. Economic use of our land should always yield a profit to us owners, because just leaving land alone, as wilderness, will improve the ecosystem, return pure water to acquifers, build topsoil, control erosion, etc. These are all valuable to human survival, even tho we haven't learned to evaluate them in dollars and cents, yet.

As to using nonrenewable minerals to which the public has title on public lands, this should be permitted only after careful planning as to what rate of use is optimal for the public good and how our way of life and population size are going to be adjusted to doing without them when they are exhausted. Only enhanced benefit will result from slowing our rate of use of these resources, for they will not go away and they will increase in value as time goes on. Meanwhile, the values of wilderness to the people, as outlined above, will be enjoyed.

Thus, it would seem best to classify all land as wilderness at the beginning as a general principle and remove it from that classification only when the yield to the public from destructive recreation or economic exploitation are sufficiently great to clearly over ride the values that natural land management, i.e. wilderness, quietly gives us without our having to do much of anything except protect the land from vandalism.

Sincerely,
Huachuca Audubon Society
Frank H. Hirst
Frank H. Hirst
Conservation Chairperson

Box 63, Post Office
Sierra Vista, Az. 85636

131

TO: Steve Knox, EIS Team Leader Safford District Office B.L.M.

FROM: Drew Crook, P-24 12433 N. 28th Drive, Phoenix, AZ. 85029

RE: Gila Box Wilderness Study Area

I vigorously support wilderness designation for the Gila Box WSA. Opportunities for solitude are outstanding throughout most of the WSA. The rugged topography with its numerous canyons offers many opportunities for isolation and solitude in the "wilderness experience" which is enhanced by the WSA's large size and natural condition.

Opportunities abound for a variety of recreation ranging from wilderness experience to wildlife observation, river running, photography, hiking, solitude, and horse back riding.

Scenery is unique! The Gila and San Francisco Rivers have a combined flow length of aproximately 18 miles in the WSA. The "last freeflowing stretch of the Gila River in Arizona" resides in the Gila Box WSA.

Wildlife is abundant and diverse. The area provides winter habitat for bald eagles.

The current state of geothermal technology and moderate resource potential for the Gila Box WSA makes exclusion for energy considerations nonviable.

131-1 Estimated Off Road Vehicle (ORV) opportunities and usage are grossly over stated and not substaniable with facts. In addition, the benefits derived from wilderness classification of the Gila Box WSA will greatly exceed the costs of loss of ORV usage, particularily when the wide range of other ORV areas are considered. The diversity and potential of non-ORV recreational opportunities available with the wilderness designation of the Gila Box WSA provides benefits for far more people than the ORV can. In addition, Arizona have far more areas available for ORV usage than for wilderness experience.

I strongly support full wilderness classification for the entire Gila Box WSA.

Drew Crook

RESPONSE — LETTER 131

131-1 See Responses 1-2 and 101-2.

132

BRUCE BABBITT
GOVERNOR

OFFICE OF THE GOVERNOR
STATE HOUSE
PHOENIX, ARIZONA 85007

IN REPLY
REFER TO:

August 30, 1983

Mr. Lester K. Rosenkrance, Manager
Safford District
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear Mr. Rosenkrance:

Enclosed are the comments of the Rangeland Advisory Council on the Draft Wilderness Environmental Impact Statement. Please consider these recommendations in the development of the Final Statement.

Sincerely,

George Britton
Executive Assistant

GB:dp

Enclosure

cc: Fred Baker

ARIZONA
OFFICE
OF THE
GOVERNOR
BRUCE BABBITT

OFFICE OF
ECONOMIC PLANNING AND DEVELOPMENT
Larry Landry, Director • (602) 255-5371 • General Offices of OEPAD • 4th Floor

August 25, 1983

The Honorable Bruce Babbitt
Governor of Arizona
State House
Phoenix, Arizona 85007

Dear Governor Babbitt:

The Rangeland Advisory Council has reviewed the Draft Wilderness Environmental Impact Statement prepared by the Bureau of Land Management, Safford District. Our comments on issues related to the Proposed Action are noted herein. The Council respectfully requests that your Office transmit these comments to the BLM Safford District for consideration in the Final Impact Statement.

This Statement analyzes the environmental impacts of proposed wilderness desgination and recommends that portions of four units, totalling 34,881 acres, be added to the National Wilderness Preservation System. The remaining five units addressed in the Statement are not proposed for wilderness designation.

The Council supports the Proposed Action described in the Draft Environmental Impact Statement on all of the units considered, with the exception of the Black Rock Wilderness Study Area. In that case, the Bureau of Land Management proposes to designate as wilderness 6,590 acres. The Council is aware of concern with this Proposed Action from potentially affected allotees, but lacks sufficient specific information to comment adequately at this time. Council Member Alan Day has been asked to examine this matter and to report his findings back to the Council. We will then use this information to make specific recommendation on the status of Black Rock.

The Council would also like to commend the Safford District for the quality and thoroughness of their work in the development of this Statement. Similarly, their presentation to the Council was complete and most helpful to us. We further recommend that the Safford District make similar presentations to as many interested groups as possible, especially to those who do not support the Proposed Action described in this Statement.

The Council will subsequently provide further comments on the Black Rock unit. Please contact me if you desire additional information.

Sincerely,

Fred Baker

Fred Baker, Chairman
Rangeland Advisory Council

FB/cln

Mailing Address: Executive Tower Room 505 • 1700 West Washington • Phoenix, Arizona 85007

133

Sunrise, Mt. McKinley — Ansel Adams

SIERRA CLUB
LEGAL DEFENSE FUND, INC.
2044 Fillmore Street San Francisco, California 94115 (415) 567-6100

SAN FRANCISCO OFFICE
Fredric P. Sutherland
Executive Director
Laurens H. Silver
Michael R. Sherwood
Julie E. McDonald
Stephan C. Volker
Staff Attorneys
Vawter Parker
Litigation Coordinator
Earl Blauner
Of Counsel
Deborah S. Reames
Legal Assistant
2044 Fillmore St.
San Francisco, CA 94115
(415) 567-6100
ROCKY MOUNTAIN OFFICE
H. Anthony Ruckel
William S. Curtiss
Karin P. Sheldon
Lori Potter
Staff Attorneys
Symes Building
820 16th St.
Suite 514
Denver, CO 80202
(303) 892-6101
WASHINGTON, D.C. OFFICE
Frederick S. Middleton, III
Howard I. Fox
Durwood J. Zaelke
Staff Attorneys
1424 K St., NW.
Suite 600
Washington, D.C. 20005
(202) 347-1779
ALASKA OFFICE
Lauri Adams
Staff Attorney
419 6th St.
Suite 321
Juneau, AK 99801
(907) 586-2751
NEW YORK OFFICE
Felicity L. Nitz
Assistant to the Director
2111 E. 86th St.
Suite 600
New York, N.Y. 10028
(212) 289-4606

August 26, 1983

District Manager, BLM
425 E. 4th Street
Safford, Arizona 85546

Dear Sir:

The purpose of this letter is to urge a wilderness designation for the Gila Box. I personally visited this area in April of this year, and floated the river through the WSA. In my opinion, the area presents outstanding opportunities for solitude and is of great scenic value. In addition, I personally observed two black hawks, which appeared to be nesting in the canyon within the boundaries of the WSA. Certainly, the depth and isolation of the canyon, the outstanding wildflower displays in the uplands and surrounding canyon sides, and generally the abundant fauna warrant wilderness protection for this area.

133-1 Moreover, the fact that ORV's use this area during the dry months when the river is not flowing is not, legally or otherwise, a legitimate reason, under your Wilderness Study Policy, for making a non-wilderness recommendation. The configuration and depth of the canyon is such that ORV's could be kept out by Bureau actionif the area were designated a Wilderness. Thus, the ORV use is controllable and manageable. Extant ORV use of an area, particularly where roads and trails have not been created by ORV use, as in the canyon itself, is not a sufficient reason for non-recommendation. Certainly, during my visit, when the river was flowing, I observed no indicia of ORV use that were intrusive or visible or that affected adversely the wilderness qualities of the area.

Sincerely,

Laurens Silver

Laurens H. Silver

LHS/cc

RESPONSE — LETTER 133

133-1 See Response 1-2.

134

UNITED FOUR WHEEL
DRIVE ASSOCIATIONS
of U.S. and CANADA
8900 N. Camino de Anza   Tucson, AZ 85704

Lester Rosenkrance, District Manager
Safford District Bureau of Land Management - USDI
425 East 4th Street
Safford, AZ 85546

August 29, 1983

Re: Safford District Draft Wilderness EIS

Dear Mr. Rosenkrance:

Please let me preface my written comments with a sincere expression of appreciation for the outstanding job you and your staff did on this Wilderness Study. The personnal interest and professional dedication you and your staff exhibited is commendable.

134-1 However, I must take exception with you on several points. First, and foremost, I do not believe in, nor can I condone, political expedience at the cost of proper natural resource management. Although "wilderness" designation will not "destroy" resources per se it does certainly impact other resource values and severely restricts, if not absolutely precludes, proper resource management. "Wilderness" designation takes the management of the land and resources out of the hands of the trained, professional resource manager and puts it in the hands of the politician. It leaves resource management decisions to the mercy and whims of the vote seeking politician.

Basically your reasoning and judgement on maintaining multiple-use management on 5 of the 9 WSA's is well founded. Your decision to keep the "Gila Box" areas in multiple-use exemplifies this and your professional management ability should be commended. However, your reasoning on recommending "wilderness" status of the other 4 areas (Needles Eye, Black Rock, Fish-hooks and Happy Camp Canyon) seems to hint at political expedience. You seem to have based your decision on very weak reasons just to have some "wilderness" to satisfy that small segment of the public that is demanding wilderness. In reality the land and resources will dictate what does and what doesn't qualify as "wilderness". Let's face it, none of these WSA's are anywhere close to qualifying as "wilderness". You should stand on your professional integrity and tell the public that you can't make a silk purse from a sow's ear. While some of the public may demand wilderness will they really be satisfied with these sub-marginal and insignificant sacrificial offerings you've proposed to appease their demands?

134-2 In the Needle's Eye WSA (4-1A) you suggest that the vegetation type will add to the diversification of the Wilderness System. This is really a very thin excuse to qualify an area for "wilderness". There are several Wilderness Areas in Arizona today that represent the vegetative type of this area (Pusch Ridge, Kofa, Organ Pipe, Cabeza Prieta, Saguaro-Rincon, etc.). This same reasoning applies to the other areas you propose for wilderness. You also state that this area and the other WSA's have little or no mineral potential, yet you admit in your EIS that the area's are in "known mineral zones and are surrounded by moderate to heavy mineral activity". Have you talked to any exploration geologists about this?

You say that Black Rock (4-8) and the Fishooks (4-14) have high riparian habitat values. No doubt that they do, but will "wilderness" designation really give more protection or better management to these riparian zones? I seriously doubt it. You state in your reasons to maintain multiple-use on

RESPECT...PROTECT...AND ENJOY: LAND, WATER, MOUNTAINS, AND SUN RESOURCES

other WSA's that you have the authority and capability to insure adequate protection of these and all resource values without "wilderness" designation. This is very true, but you fail to emphasize this fact. It appears you even forsake this fact and imply that the "wilderness" values of some WSA's will be destroyed if the area's go back to multiple-use. This concept holds true for all the area's you manage. You even admit in your discussions on impacts that the "wilderness" designation may attract visitor use and severely damage the very resources you want to protect. You even stated that some local residents are justifiably concerned about attracting crowds (witness the problems associated with the Aravaipa Wilderness). Here in Arizona riparian resources are even more valuable and it would seem to me that multiple-use management offers greater protection and management flexibility to optimize the resources. This logic would also prevail over any "cultural" resource values of an area.

134-3 You also have failed to adequately address the problems of State and Private inholdings in these proposed "wilderness" WSA's. While the State Land Department of Arizona may be willing to exchange out, I doubt that the private land owners would (especially in Black Rock & Happy Camp Canyon). Happy Camp Canyon is a classic location for a "private wilderness" development if the area were to become Wilderness. The landowner would probably increase the value of his land 1000X and become rich. But, what would this development do for the "wilderness" resources?

Overall I can find no logical, professional reasons why any of your WSA's could ever qualify as "wilderness". You should explain this simple, natural fact to the public and reassure them that non-wilderness does not mean that any "wilderness" values that may exist will be destroyed. Re-emphasize your ability and legal authority to protect all resources under the multiple-use management alternative.

America needs the strong, dedicated professional resource management leadership you seem to possess if we are to maintain our resource values and quality environment. Our future lies in the quality and quantity of our natural resources. We must see to it that future generations have an equally sound resource heritage that we have had.

Thank you for this opportunity to comment. I sincerely hope that my remarks are not taken as harsh criticism, but as constructive thoughts.

Respectfully,

Stu Bengson

Stu Bengson, Director, Land-Use
United Four Wheel Drive Assoc.

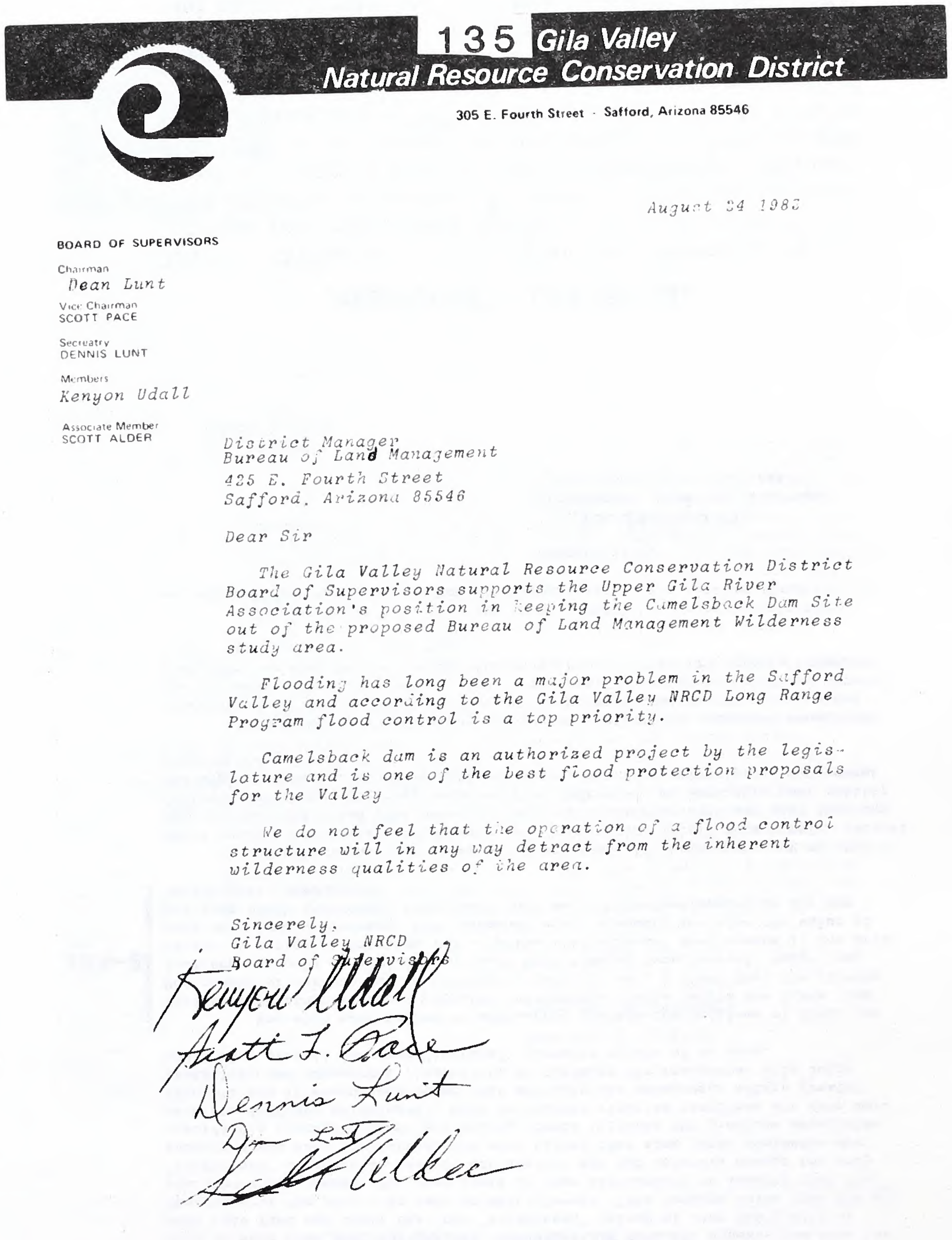
cc:
Dean Bibles
Robert Burford

RESPONSE — LETTER 134

134-1 Wilderness designation can adversely impact existing resource values and uses. In some cases it may even prohibit some uses. However, wilderness management will not restrict or preclude proper resource management. With the passage of the Federal Land Policy and Management Act in 1976, Congress directed BLM to manage the public lands for multiple use and sustained yield of its resources. Under that mandate BLM manages the public lands for a variety of resource uses including mineral and energy production, logging, livestock grazing, ORV driving and wilderness, to name a few. In this wilderness study BLM is considering the impact of wilderness management on existing and potential uses of the wilderness study areas (WSA). The BLM has found, based on consideration of all resource values and uses, that certain WSAs are not appropriate for management as wilderness areas and has recommended nonwilderness. However, the Bureau found other WSAs deserving of wilderness status and has made recommendations to that effect.

134-2 Wilderness designation presents an opportunity to preserve, in an unimpaired condition for future generations, examples of the basic ecosystems and land forms present in the United States. BLM has selected the Bailey-Kuchler ecosystem classification system to analyze the opportunity to expand ecosystem representation in the wilderness system. The Bailey-Kuchler system was selected because it facilitates planning at the national level and provides a broad synthesis of current knowledge about the ecosystem geography of the country. It also serves as a useful reference for those who desire an overview on a comparable basis of ecosystem and land form representation in existing and potential wilderness units. Table 3-1 of the EIS shows the Needle's Eye WSA in the Creosotebush/Bursage potential natural vegetation type. Table 3-2 shows this type is not currently represented in the wilderness system. These data were derived from the Bailey-Kuchler ecosystem classification system. The other WSAs are also addressed in these tables. With reference to your question of consultation with exploration geologists, the district mining engineer spent many hours in consultation with the Arizona Bureau of Geology and Mineral Technology, members of the mineral industry and individual professionals in the field.

134-3 The problems with inholdings were addressed throughout the EIS. The analysis discusses the impacts of the inholdings on the wilderness values since private landowners have the right to use their property as they wish, within the law. The impacts of inholdings on wilderness values are addressed in Chapter 2 for Gila Box, Turtle Mountain, Javelina Peak and Dos Cabezas Mountains WSAs. Inholdings are further addressed in Chapter 3, where Land Use identifies all inholdings and in Chapter 4 where Land Use addresses the impacts of wilderness management on inholdings.



135

Gila Valley
Natural Resource Conservation District
305 E. Fourth Street · Safford, Arizona 85546

August 24 1982

BOARD OF SUPERVISORS

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Members
Kenyon Udall
Associate Member
SCOTT ALDER

District Manager
Bureau of Land Management
425 E. Fourth Street
Safford, Arizona 85546

Dear Sir

The Gila Valley Natural Resource Conservation District Board of Supervisors supports the Upper Gila River Association's position in keeping the Camelsback Dam Site out of the proposed Bureau of Land Management Wilderness study area.

Flooding has long been a major problem in the Safford Valley and according to the Gila Valley NRCD Long Range Program flood control is a top priority.

Camelsback dam is an authorized project by the legislature and is one of the best flood protection proposals for the Valley

We do not feel that the operation of a flood control structure will in any way detract from the inherent wilderness qualities of the area.

Sincerely,
Gila Valley NRCD
Board of Supervisors

Kenyon Udall
Scott L. Pace
Dennis Lunt
Dean Lunt
Scott Alder

136*

Newell Dryden
Custom and Corrective
Horseshoeing

To whom it may concern:

We the Dryden and Holiday family and neighboring ranches disagree with the proposals made by BLM and U.S. Forest Service regarding the Black Rock area as a proposed wildernese for the following reasons.

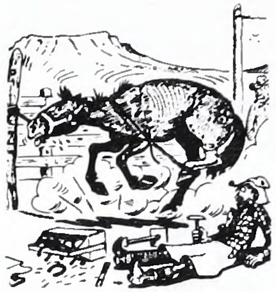
Access to any public or private land in the Black Rock Area by vehicle is only accessible by usage of private land or Reservation land. Thus leaving the maintsnance of the road the responsibility of ths COUNTY, INDIVIDUALS or RESERVATION. To my knowledge the county has only gradsd the road as a public courtesy NOT as a legally public maintained road.

136-1

Dus to the recent acquiring of land by the Bureau of Indian Affairs I express my concern for denial of access of not only private lands but also public lands if the Black Rock Area should become a wilderness. Classificaions of adjacent lands will be changed denying or hendering commercial application.

The possible reasons for denial of access to public or private lands expressed by myself, my family and my fellow private land owners are as follows:

1) Unnsceseary vehicular traffic - resulting in disabled vehicles
2) Strandsd vehicles in creek, washouts, and sand washes, dead batteries flat tires, and numeroue other mechanical failures
3) Excessive speeds endangering personal property and LIVES
4) Littering of public and private land



136-1

5) Requesting permission for safe parking of vehicles and camp sight protection from vandalism and pilfering leaving the private property owner liable for any damages.
6) Dueto seasonal conditions, requests for additional water and dry goodc prevail because of lack of preparation and knowledge of terrain and seasonal changes
7) Inhuman abuse of privately owned livestock such as Rock throwing, chasing down of dogs, horees,&cattle, and discharge of firearms on private land
8) Indecent exposure which includes nudity, urinating, nude sun bathing and swimming all within view of residence
9) Illegal wood cutting
10) The BLM nor the U.S. Forest Service has established a usage zone or buffer zone around the perimeter of the wilderness study areas for public use. They are asking the Private land owner to let the public park and litter these private lands

136-2

Both the BLM and U.S. Forest Service have been very understanding with our concern and problems relating to public usage of private land. The answer that was given to us by BLM and by the U.S. Forest Service was that they do Not have the personnel to enforce these laws and regulations. I am saying now that if BLM and the Forest Service do Not have the personnel to enforce these laws and regulations now, how do they expect to do it later, when that area is turned into a wilderness area? Who is going to stop the off-roaders? Who is going to stop the littering? and who is going to stop the pilfering and vandalizing?

I see no way, in my past experiences, that the personnel of BLM and/or

Newell Dryden

Custom and Corrective
Horseshoeing

136-2 Forest Service can staff up enough to take care of these designated wilderness areas, One reason being they do not have the budget. I have worked for BLM and I know their problems with budgeting. They are the same as everyone else in that they have a monthly budget to comply with. They have to budget for problems in vehicle maintenance, maintenance of existing facilities, any existing and future studies, man power, tools , and equipment, enforcement of rules and regulations, and future needs years in advance. Economically , I eee no way now or in the near future that the government will be able to provide the manpower or funding which will be necessary to deeignate Black Rock a wilderness area.

One aspect that has not been called to your attention in any of the past public wilderness hearings regarding the Holiday and Dryden Ranch is the long existing legal and moral reeponsibilitiee of Mr. and Mrs. V.N. Dryden in relationship to the guardianship of Franklin H. Holiday.

They are legally and morally bound to provide a permanent place of residence which assures his surroundings to be that of the Black Rock Ranch until he is unable to reside at this location for medical purposes.

Franklin H. Holiday was born mentally incompetent and has resided at the Black Rock Ranch since birth in 1912.

I feel it would be morally wrong to deny thie man access to hie only known home.

Because of these reasons we the Holiday and Dryden Family are apposed to the proposed BLM and U.S. Foreet Service wilderness study area in the Black Rock allotment.

Newell Dryden

Custom and Corrective
Horseshoeing

THE HOLIDAY AND DRYDEN FAMILY

Virgil & Chloe Dryden

Franklin H Holliday by legal guardian Chloe Dryden

Joann Clark Slaughter

Curtis Dryden

Mr. & Mrs. Newell Dryden

RESPONSE — LETTER 136

*Thirty-two signatures accompanied this statement. They are not reproduced in this document but are available for inspection at the Safford District Office.

136-1 See Response 87-2.

136-2 BLM does not have the authority to regulate public use of private lands. The assumption was made for the purpose of analysis that BLM funding would be adequate for implementation of any of the Alternatives. Also see Response 16-1.

137

SIERRA CLUB

Grand Canyon Chapter · Arizona

August 1983

Dear Mr. Rosenkrance:

The Gila Box is an example of exactly the sort of irreplaceable resource for which congress designed the wilderness designation. Therefore, I feel you are obligated to call this unique area of public land to the attention of congress by recommending wilderness designation for the Gila Box and allowing congress to make the final decision.

137-1 Your own draft wilderness EIS proves the Gila Box qualifies as a potential wilderness area. In spite of this, you believe that giving this rare stretch of free flowing stream over to ORV use typifies the sort of public multiple use you are mandated to provide. You have wisely committed to cutting grazing and to revegetation projects for this segment of the Gila River. You feel that, with the ORV use confined to periods of low stream flow and rafting confined to periods of high flow, you've designed the best possible management plan for the area; and no real conflicts exist. I disagree, and urge you to reconsider your decision.

The issue of the noise polution caused by ORV use should be re-examined carefully. What is it's effect on horseback riding inthe area? What is the effect on hiking in the area? What is the effect on wildlife?

My own personal feeling is that every remaining roadless, public land, riparian area in Arizona should be set aside for use by members of the public willing and eager to experience the area without the noise of motors and generators.

Sailing on Lake Pleasant or Saguaro Lake cannot be experienced without the high decibel roar of diesel engines. Complaints pour into the Sierra Club, lodged by hikers from around the world who complain that their enjoyment of the Grand Canyon has been violated by the noise of air planes and helicopters. The segment of Sycamore Creek just west of highway 87 and east of the Fort McDowell Indian Reservation was lost to ORV use years ago. Camped beside White Horse Lake, one cannot experience the natural sounds of a forest lake at night because one hears only generators powering TV sets in mobile homes. The list is endless.

You already know my opinion of the need for wilderness--the need for solitude--and the need for silence in which to hear only natural sounds. The question is--do I represent the feelings of a large segment of the population?

137-2 The BLM State Office has in its possession the results of their survey conducted to detirmine the attitude of the general population of Arizona toward wilderness. A summary of the survey results should be included in the final Safford District Wilderness EIS.

The entire membership of the Sierra Club and the Audubon Society has gone on record with their opinion, demanding wilderness designation for the Gila Box. The lists of people from across the country applying for permission to enter monitored, non ORV use areas in Arizona such as Aravaipa and Ramsey Canyon have indicated their need for this type of recreational opportunity. The creation by congress of the wilderness designation testifies that duly elected representatives from across our nation recognize that their constituency insists this option be available on public land in sufficient quantity to meet the needs of future generations.

Pols show nation-wide support for wilderness--not only because the general public equates wilderness with peace and quiet--but also because they equate wilderness with protection for both game and non-game wildlife habitat.

In 1982, taxpayers in Arizona contributed $323,400 out of their pockets to support improvement of non-game habitat. The amount raised by the tax form check off was twice the amount anticipated by the Arizona Game and Fish Department. I feel that Arizona's citizens consider protection of wildlife habitat a high priority.

137-3 Both Arizona Game and Fish and U.S. Fish and Wildlife have written your agency expressing strong support for wilderness designation of the Gila Box area. The final EIS should include the entire text of the recommendations from these wildlife experts. They tell me that gaining protection for this unique area is of critical importance.

Considering the support for this area's inclusion in the wilderness system, I am surprised by your recommendation of no wilderness. It is even more perplexing when the current situation regarding mining claims is examined. Because most of this area was withdrawn from mineral entry by Bureau of Reclamation pending decisions on a proposed dam, there are few existing mining claims and there are no current oil and gas leases.

The potential for any significant mineral finds is extremely low and is easily out-weighed by the need to protect this natural resource. Furthermore, the plan to build a dam in the area has proven totally unfeasible. Plans for off-channel storage of peak flows would require re-negotiation of existing water rights which is not likely to occur.

It is hard to imagine an area with more to recommend its inclusion in the wilderness system. And it is unlikely that you will find one with fewer real conflicts.

I hope the turn out at the Phoenix area hearing assured you that recreationists from urban areas feel great concern over the future of the Gila Box. Environmentalists from around the Southwest are concerned about the eagles that nest nearby and feed in the area. They are not convinced that there can be any guarantee of the continued protection of the environment surrounding current nesting sites on adjacent private land.

I urge you to follow the advice of the wildlife agencies, ASU wildlife specialists such as Dr. Ohmart and botonists such as Dr. Minckley; and to recommend wilderness designation for the Gila Box.

Sincerely,

Beth Medrano

Beth Medrano
Sierra Club
Chapter Conservation Chair

RESPONSE — LETTER 137

137-1 See Response 1-2. Also for a discussion of noise pollution and its impact on other resources, see Noise, Chapter 3 and Chapter 4.

137-2 See Social Elements, Chapter 3, Arizona Wilderness Public Opinion Survey.

137-3 Comments received from the Arizona Game and Fish Department and the U.S. Fish and Wildlife Service have been reproduced in this document. See letters 59 and 96.

138

SIERRA CLUB
Grand Canyon Chapter · Arizona

8/25/83

To: Lester Rosenkranz, District Manager
Safford District, Bureau of Land Management
425 E. 4th Street
Safford, Arizona 85546

From: Sierra Club, Grand Canyon Chapter; Paul Hirt, Jake Turin, Gayle Hartmann, Charles Greifenstein, Tim Vanderpool, Mike Cease, Doug Stevens and Jim Notestine.

Re: Comments on Safford district Draft Wilderness E.I.S.

We are submitting the following comments on behalf of the Grand Canyon Chapter Sierra Club and its 4,000 members. We have been involved in the B.L.M.'s wilderness review program since its inception and welcome this opportunity to express our views on the Safford district Draft E.I.S.

We would first like to commend the preparers for a most clear, concise and informationally complete E.I.S. In particular, we commend your use of ABGMT earth materials data, the excellent fold-out maps of each area, the complete and fully descriptive section on "Affected Environment" and the acknowledgement of important wilderness management policies such as the maintenance of existing and planned stock facilities and the allowance for development on valid mining claims established prior to 1/1/84. There is more to be praised in this well prepared D.E.I.S. and those are but a few of the high points. We hope that this document might serve as a type of model for the rest of the State.

There are just a few specific points and errors that we would like to bring to your attention, and we have a general complaint concerning the paltry recommendations you end up with.

138-1 1) On page 2 of the D.E.I.S. you state that you will not recommend reclassification of air quality standards to class I should an area be recommended for wilderness. We realize that this statement is rhetorically couched as a "recommendation" rather than a decision, but we take this to be a clear desire or intention not to enforce strict clean ambient air quality in wildernesses. Although we can guess that this is intended for the benefit of nearby large mining operations, there is no explanation whatsoever in your document for the recommendation- or lack thereof.

There is a manifest precedent and obvious congressional intent for National Parks and wilderness areas to have strict class I clean air protection. If you are going to persist in bucking that, you ought to have a good explanation for it in the Final E.I.S. You seem to be hiding this controversial action in a simple statement which you label an "assumption" as though it were a 'given' in the problem of Enironmental

138-2 Consequences. It does not belong on page 2 under "assumptions", but rather under the section on Alternatives with the environmental consequences fully explored. This is a serious fault in your document, your recommendations and your philosophy.

138-3 2) On page 2 and page 65 of the D.E.I.S. under Impacts to Minerals and Energy you erroneously state that "Designating an area as wilderness would close it to all new claim staking, prospecting and exploration work under the mining laws." Actually, only claim staking is closed by wilderness designation, not prospecting or exploration. You then go on to state, evidently based on this erroneous assumption, that "wilderness designation would thus have a significant adverse

impact on mineral exploration under all alternatives except no wilderness..." and " the chances of an initial (mineral) discovery after wilderness designation are nearly non-existent." These are gross errors and exagerations which should be corrected.

First of all, the view that a significant adverse impact on exploration would accrue as a result of wilderness is founded on an untrue assumption: that prospecting and exploration would not be allowed. It is curious to us that the B.L.M. should be under such a misconception. We wonder, too, whether ABGMT and those who worked on the mineral and energy data also hold this belief.

Secondly, it is much more probable that any areas with any good evidence of mineral potential will in all likelihood still be explored for the possibilities. Even industry interests may continue to survey and gather data; and if they don't, federal, state and private research and educational organizations will always be gathering data for a whole picture of Arizona's resources. The U.S.G.S., U.S. Bureau of Mines, Az. Bureau of Geology and Mineral Technology, Az. Dept. of Mineral Resources and university related research groups all would continue to be interested in complete up-to-date inventory data on mineral and energy resources. These agencies care little about who owns the land or how it is managed. In addition, as you mention in the D.E.I.S., the U.S. Bureau of Mines and the U.S.G.S. will be conducting extensive mineral surveys on areas deemed suitable for wilderness.

138-4 Finally, even if all the above were not considered, it is dubious at least that there might be any significant adverse impact on exploration in light of the known mineral resources in these WSA's. As was mentioned in the public hearings in Tucson,according to the best data available today, six of the nine WSA's have " no known economic mineral deposits." The other three have minor or insignificant potential which is completely excluded in the enhanced wilderness alternatives for these areas. Obviously, these areas are very poor candidates for mineral development and any reasonable businessman would not waste much time and energy in an area with unfavorable geology and an unproductive exploration history. Based on this fact alone, it is doubtful whether any serious, extensive or aggressive exploration would ever take place by commercial operators. Wilderness would be no intrinsic inhibition for federal or state agencies so exploration could just as easily be completely unaffected as adversely affected.

138-5 Thus, in actuality, the impact of wilderness designation would in all probability be far less than "significant." The claim of "adverse impact" is general and philosophical at best, is not founded on facts or probability, and does not belong in the D.E.I.S. We would challenge you to substantiate your position on this.

138-6 We have another criticism of your mineral data: to the layman or the uninformed, the plethora of information on mineral occurences outside the WSA's can leave an impression that a similar potential lies within. In almost all cases this is theoretical at best, a distinct stretch of the imagination or simply untrue. No effort is made, however, to disclaim this. There is no explanation that all the mineral and production data is simply an indication of what lies in other or merely similar geologic settings and is not in most cases an indication of what lies within the WSA itself. We view this as an attempt to impress non-professionals with the erroneous idea that these areas are rich with potential.

The last criticism of your mineral and energy information focuses on your discussions of geothermal resources in which you cite temperature data without explanations. You do

not mention that 150 degrees centigrade is the minimum temperature for electrical generation, that only one well in Arizona reaches that temperature, and that, in fact, industry generally will not touch anything less than 180 degrees centigrade for electrical generation.

You do not explain that there is no possibility for geothermal resources in Arizona to contribute in any way to energy production on a commercial scale in Arizona. You do not explain that all the geothermal resources in the WSA's are only capable of providing localized "direct use"; and you do not explain what uses those might realistically be in a remote roadless area.

138-7 Your temperatures cited for the Gillard Hot Springs are outdated and inflated. The 1983 official revised estimate at depth is 139 degrees centigrade. We recommend that you contact Ms. Claudia Stone, former ABGMT employee and authority on geothermal resources, now a private consultant at 5933 E. Pima, Tucson 85712, phone 886-5625. We hope that the Final E.I.S. will discuss what geothermal exploitation options there are in these WSA's as well as how successful your bids and active the bidding interests are on these resources.

3) We would like to suggest that you resist perpetuating the myth that the wilderness label will attract hoards of new visitors into every area so designated. This "neon-sign" syndrome often causes needless worry to ranchers. We contend that the great influx of visitors to such wilderness areas as Pusch Ridge and the Superstitions is due mainly to their proximity to large urban areas and their well-developed access.

Additionally, as the volume and distribution of wilderness areas increase the mystique and attraction will diffuse. The concerns of the permitees in the Black Rock / Santa Teresa area center on the potential consequences of increased visitation. Here in the Safford district though, there would probably not be any more of an increase in recreational use than normal- with or without wilderness designation. In fact, wilderness is essentially a guarantee of the existing status quo. We suggest that you contact the Safford district of the Forest Service for figures on recreational use in the similarly remote Galiuro Wilderness, before and after designation, and discuss those figures with the ranchers.

Our 'general complaint' centers on the fact that of the 1.3 million acres that you manage only 25% was inventoried as roadless and only 10% of that is being recommended by you. That is, you are promoting only about 2.5% of the district for wilderness management. This is completely unacceptable! We perceive a distinct bias against wilderness reflected in your impoverished recommendations. In some units, like Gila Box, Turtle Mountain and Day Mine, your rationale for non-recommendation was extraordinarily weak and clearly appealable. The Sierra Club recommends wilderness for all nine WSA's as well as for Baker Canyon, Bowie Mountain and Mule Shoe, which were illegally dropped by sect. Watt last December. We feel that all these areas have outstanding wilderness values that deserve protection.

As was thoroughly discussed at the public hearing in Tucson, we feel that the draft recommendation does no justice to the unique and valuable qualities of these areas so enthusiastically touted in the D.E.I.S. Like a Dr Jekyll and Mr. Hyde, your glowing assessments of the wilderness areas and your recommendations for them seem to come from two alienated pens. They make little sense, while creating disappointment and frustration.

We feel that this poverty in your recommendations must be founded on a simple bias against wilderness. Our recommendation, then, for the benefit of the agency and the local rural populace (which seems to be either similarly biased or ignorant of the meaning and value of wilderness), is to make an effort in the Final E.I.S. to actually promote wilderness management, not just wilderness qualities. That means, discuss the benefits of wilderness management for recreational opportunities, wildlife and habitat protection, clean air and water, vegetative health and diversity, cultural / historical resources, natural ecosystems, visual quality, etc. You should also have a special section dealing with wilderness myths of which there are plenty.

We suggest that you search your public hearing records from the 'scoping' process and pull out those erroneous assumptions and misinterpretations about wilderness expressed by the public. Then address those myths in a special chapter or section entitled something like "Wilderness: What it Is and Isn't." If you need any input on additional myths and misconceptions feel free to contact us, we have an extensive collection with sample responses from all over the United States.

Wilderness is still a big bugaboo for many people and a radical concept as well. As you stated in your D.E.I.S. many of the locals could not comprehend any value in wilderness (page 51). You need to involve the agency more in education and promotion of wilderness values in order to respond effectively to this problem.

Establishing a new type of management practice and philosophy is no easy task, especially when it involves a non-consumptive orientation for a consumptive society. The value is nevertheless there and is so important that Congress mandated its application to all federally managed multiple-use lands. Wilderness is a multiple use, and an important essential one. After 20 years, though, it is still an emotionally volatile and controversial topic. Headway toward acceptance is gained only through effort. An unwillingness of federal land managing agencies to tackle the problem of wilderness myth countereducation, and the general promotion of wilderness as an essential and desirable aspect of multiple use, has contributed greatly to this inertia.

We would like to see the Safford district display the integrity, courage and conviction that it will take to strive for the promotion of such progressive land management policies as the establishment of a large selection of healthy and diverse wilderness ecosystems in your own district. A minimum of 100,000 acres, the enhanced wilderness alternative roughly, would be an acceptable amount. That is only about 7½% of the district, a relatively meager sum.

138-8 One postscript comment: we would like to encourage you to extend your contingency recommendations (ie: Black Rock) to include WSA's and areas within WSA's that have simple inholdings problems; especially where only state land is involved. If you can make your Black Rock recommendation contingent on a Forest Service Santa Teresa recommendation, then you could also establish wilderness recommendations for other areas contingent upon a land trade with the inholder(s). This is especially relevant to the Peloncillos where "irregular boundaries due to state inholdings" are almost the sole reason for non-recommendation.

Eventual land trades are inevitable and WSA's have been given priority consideration in BLM / state land trade proposals. The inclusion of these contingency recommendations is the least the BLM should consider in areas where inholdings

138-9 are the major conflict. Any omission of such recommendations in the final E.I.S. should be carefully justified. Inholdings, in and of themselves, are not a justification for disqualification of an area from wilderness designation. This is especially so when there is a clear willingness on the part of the inholder, as in the case of the state, to affect a trade.

The following reports are individual statements on eight of the WSA's written by Sierra Club volunteers. They should be treated as individual responses. Once again, we stress our support for each of the nine WSA's and recommend a minimum of approx. 100,000 acres, the enhanced wilderness alternative with the recommended adjustments in the Happy Camp unit, and all wilderness in the Day Mine unit to maintain contiguity with Fishhooks (see reports by Jim Notestine and Mike Cease following).

Once more we appreciate the opportunity to comment on the Draft Wilderness E.I.S. We commend the district for its technically excellent document, and hope that our comments will aid in the preparation of the final. We sincerely hope that the points brought out here will be considered carefully and we look forward to reviewing your responses. If there are any questions you have concerning anything contained herein, please do not hesitate to contact us.

Sincerely, Paul W. Hirt

Paul W. Hirt, conservation chair
Rincon Group, Sierra Club
On behalf of:
The Grand Canyon Chapter

Report on the Gila Box W.S.A

By Paul Hirt
P.O.Box 40154
Tucson, Az. 85717

As was mentioned in my testimony at the public hearing in Tucson, your recommendation for no wilderness in the Gila Box is as puzzling to me as it is maddening. I can only hope that it was simply a mistake which you intend to correct in the final E.I.S.

There is no need here to underscore the outstanding and unparalled wilderness qualities of the Gila Box which you so aptly elucidate in the Draft E.I.S.There is also no need to repeat the lengthy oral testimonies of Sierra Clubber Mary Kosaboom or Maricopa Audubon president Dr. Bob Witzeman in Phoenix concerning the unique ecological values of the area. There is also no need to repeat much of my own testimony on the various other reasons that the Box should be designated wilderness. The simple truth is that the Gila Box is one of the most valuable and outstanding WSA's in the state with a virtually unique collection of geologic, ecologic, scenic and recreational qualities. In addition, the area has the unflagging support of several national conservation organizations, state and federal wildlife biologists, and a vast majority of the commenting public.

A non-recommendation for this area is in blatent contradiction to every indicator set up to determine those WSA's which qualify for wilderness. You mention only three factors which contributed to the non-wilderness decision: ORV use in the canyon bottom, ORV use in the riparian regeneration project, and geothermal potential on the east end. All of these excuses are shattered with the slightest examination:

138-10 1) ORV use figures set at 5,000 RVD's were not derived from B.L.M. data but were obtained from a local ORV enthusiast and are almost certainly inflated. No contrasting use figures

138-10 were offered for non-motorized recreation.

The 75,000.00 dollar "loss to local economies" figure due to this loss of ORV use is completely invalid. Since the money originates and stays in the local economies it cannot be said to be gained or lost. Furthermore, we challenge the validity of the sum and would like to see a delineation and justification for it based on agency validated use figures. Irregardless of this, as you admit in the D.E.I.S., ORV use would probably shift to other nearby areas, so that the gasoline, beer and new transmissions will still be locally purchased and consumed.

138-11 2) As for the ORV groups helping with the riparian regeneration project, there is precedent for allowing temporary authorized vehicular use in order to implement Habitat Management Plans of which this project is a part. Wilderness would not preclude this option. Secondly, no effort was made to solicit volunteers from any of the many conservation organizations, wildlife groups and hiking clubs in southern Arizona to help with the project. Lastly you admit in the D.E.I.S. that the project could be re-written anyway to accomodate non-vehicular access.

138-12 3) Geothermal resources also are a weak excuse for non-wilderness. First of all, the area with potential in question is a fault running through the east end and into Turtle Mountain. This fault is wholly excluded in the enhanced wilderness alternative. So why not recommend the enhanced version? Secondly, the geothermal resource is only capable of providing localized direct use. I'd like to know what kind of direct geothermal exploitation you envision for this area. I understand no one is bidding on the lease for this resource in this remote area...

I have personally visited this WSA on three ocassions and intend to repeat the experience many more times each year. The Gila Box is a critical invaluable major perennial riparian ecosystem. No other type of management option short of full wilderness protection would be acceptable. The very fact that this is the last wild free-flowing stretch of the Gila river in Arizona should be enough to spur immediate and aggressive efforts to preserve its ancient, dwindling and irreplacable natural ecosystem. Not just riverside preservation either; the largest roadless acreage left (which is not much at all) should be attached to the riverine system to buffer, enhance and complete this priceless ecological heritage.

To ignore or not to realize the value of this WSA is incomprehensible. If any unit in the Safford district is deserving of National Wilderness Preservation System protection it is the Gila Box. The N.W.P.S. was designed to identify and preserve the last vestiges of our wilderness heitage in this country. The Gila Box WSA is the last chance for protection of the last stretch of Sonoran/Chihuahuan desert river running wild and free through S.E. Arizona.

Wilderness for the Gila Box is an inevitability, and a recommendation from the district (for an absolute minimum of 15,272 acres) would be appropriate and much appreciated.

August 21, 1983

Bureau of Land Management
Safford District
Steve Knox - EIS Team Leader
425 East 4th Street
Safford, Az. 85546

Dear Sir:

In addition to the comments I offered at the Safford District Draft Wilderness EIS Public Hearing in Tucson on July 20, 1983; I would like to submit this additional proposal attached. It goes into detail on the Happy Camp Canyon additions that I roughly outlined at the hearings.I would appreciate your consideration of the additions I've outlined. I believe they would provide a more completeand manageable unit. I am pleased that you are proposing the Happy Camp Canyon Unit. Thank you.

Sincerely,

Jim Notestine
Jim Notestine
P.O. Box 461
Sonoita, Az. 85637

HAPPY CAMP CANYON
WSA AZ - 4 - 65

Location: 7 miles South of Bowie, Az.
Size: WSA = 16,761 acres
Proposed Action = 9238 acres
BLM Enhanced Alternative = 12,807 acres
My Ennanced Proposal = 12,000 acres approximately*
*includes approximately 580 acres of State land

Jim Notestine
P.O.Box 461
Sonoita, Az. 85637
(602) 455-5324

August 21, 1983

Happy Camp Canyon - WSA AZ 4-65

I support the decision to propose a portion of the Happy Camp Canyon Unit as a Wilderness Area. I would propose a unit of approximately 2760 more acres than the BLM proposal (my proposed boundaries and additions are reflected in the attached map) which would result in a Wilderness Unit of approximately 12,000 acres. This enhancement is approximately 800 acres less than the BLM Enhanced Wilderness Alternative, but would be more manageable and would more completely protect included ecosystems.

138-13 The recommendedaddition in the area idetified by "A" on the attached map would protect both Ninemile Creek and the stands of large juniper below Government Peak. Under the BLM Proposed Action only that portion of the spectacular granite area around Peak 5019 and only one of the two streams with the "hanging valleys" would be protected. The addition of Ninemile Creek would complete the protection of that exceptional area. This addition would require acquisition of a state land parcel of approximately 580 acres. These two streams and the rugged granite area that surrounds them would provide very scenic primitive recreation with exceptional opportunities for solitude. This addition would keep that area from being fragmented.

138-14 The small addition identified as "B" on the attached map would provide better protection for the Howell Canyon ecosystem.

I support your inclusion of Howell, Upper Happy Camp, and Tar Box Canyons. They are scenic and provide excellent hiking and scrambling opportunities. They also support a diverse wildlife population including Threatened and Endangered Species.

This proposal would include two proposed RNA's and two proposed ACEC's which highlights the exceptional qualities of this Unit. Wilderness designation would be compatible with the RNA's and ACEC's.

CONFLICTS:

The Happy Camp Unit is in the Dos Cabezas Mountains which has an extensive mining history, some of which intrude into the WSA. This 12,000 acre proposal excludes the significant mining conflicts that exist in the WSA.

There are no mining conflicts in the unit and ORV conflicts are minimal.

SUMMARY:

Happy Camp Canyon would make a high quality Wilderness Unit with exceptional primitive recreation potential. Wilderness designation would protect a diverse flora and fauna including several Threatened and Endangered species, beautiful mountain scenery including a rugged exfoliating granite area with streams that have water most of the year. I recommend expansion of the BLM Proposed Action to the 12,000 acre area reflected on the attached map. It would include Ninemile Creek and protect most of the granite dominated area, the heavily vegetated area below Government Peak, and the Howell Canyon ecosystem.

BLACK ROCK WSA (4-8)
Safford District Bureau of Land Management

WSA - 8492 acres

BLM recommended action - 6590 acres

Location: 30 miles northwest of Safford
Immediately adjacent to the northeast corner of the proposed National Forest Service Santa Teresa Wilderness.

Description & Wilderness Qualities:

Located in the northeastern foothills of the Santa Teresa Mountains, the Black Rock WSA includes several outstanding topographic features. Among these are Jackson Mountain rising to an elevation of 5892 feet, Holdout Mesa, Holdup Canyon, Mud Spring Mesa, and Black Rock itself. Holdup Canyon was aptly described by Arizona Daily Star Outdoor Editor, Pete Cowgill, as follows: "It would be a perfect holdout. A whole army could try to worm its way through the area and easily pass by a person holed-out in any of a million little caves or alcoves."

Black Rock itself is a large volcanic plug rising about 1000 feet out of the surrounding plain. It provides nest sites for golden eagles and peregrine falcons, both of which were observed on a visit to the area in June 1983. It also provides interesting and enjoyable climbing opportunities with outstanding views from its summit rocks.

Among the other special features of the WSA are riparian vegetation including Arizona sycamore and Arizona walnut along several of the larger drainages and three plants on the Fish and Wildlife Service list for proposed threatened and endangered species: Echinocereus ledingii, Graptopetalum rusbyi, and Plummera ambigens.

Because of the diversity of the natural resources provided by the variable terrain, prehistoric cultural sites in the WSA are expected to be frequent. One known prehistoric site, a village along Black Rock Wash, has been placed on the National Register of Historic Places. Other areas expected to contain prehistoric cultural resources are located along Black Rock Wash and its major tributaries.

Over 27,000 aares of the Santa Teresas to the south and west of the Black Rock WSA have been proposed for wilderness by the NFS and the Arizona Wilderness Coalition. Nominating the Black Rock area for wilderness status not only provides protection for the northeastern flanks of the Santa Teresas, but also enhances the wilderness qualities of Black Rock itself.

Resource Analysis:

Grazing -- The Management Situation Analysis for Black Rock prepared by the BLM describes in detail the grazing allotments for the area. Portions of four allotments are located there: Black Rock, Spenazuma, Holdup Canyon, and Jackson Mountain. All are classified for intensive management. Generally, the allotments will continue to be managed as they are currently managed. Some improvements are proposed, but there should be no conflicts with wilderness, with one notable exception. A road about one mile in length has been bulldozed recently within the WSA in connection with grazing and mining activities. It is located in Sections 5 and 8 (T6S, R22E). As wilderness areas are by definition roadless, the eastern boundary of the WSA will have to be adjusted to exclude this road.

Timber -- No information available. Due to inaccessibility of terrain, any timber harvesting would be minimal.

Minerals -- According to a report by Susan R. Calder issued by the Arizona Bureau of Geology and Mining Technology, the known mineral resources in the WSA consist of coarse-grained crystalline fluorspar deposits. These occur as

fissure vein deposits in gneissic granite and porphyritic quartz monzonite units of the Pinal Schist formation. 138-15 Two patented claims are located in Section 6 (T6s, R22E) and six unpatented claims are located in Sections 5,7, & 8. These mines produced 1200 tons of 60-70 percent CaF_2 (fluorite) in the 1950s. It is important to note that the WSA boundary excludes the mining site (see small boundary indentation in Section 6).

A group of five prospects are located in Section 1 (T6S, R21E), but the mineral products extracted from these prospects is unknown and they are not considered a conflict with wilderness designation.

138-16 Other conflicts - access -- The only access of two landowners north of the WSA is through the San Carlos Indian Reservation. They are concerned that the Indians may choose to close their access roads and they believe that if the Black Rock WSA becomes a wilderness, closure is even more likely. If the area were to become a wilderness, road construction within the wilderness would, of course, not be permitted. For legal reasons, then, a new access road could not be constructed. However, the topography of the area is such that a new road would be very difficult to construct and extremely expensive to maintain in any case. Therefore, the best solution would seem to be negotiating an agreement with the Indian Reservation to assure that the currently used road will remain open.

Boundary Recommendation:

After careful consideration, the Sierra Club recommends boundaries identical to those of the Bureau of Land Management. The modification of the eastern boundary (the only boundary area in question) according to the BLM's proposed action seems reasonable for the following reasons:

- it follows an easily definable ridge over the summit of Jackson Mountain,
- it excludes land in Sections 5,6,7, and 8 (T6S,R22E) with possible mineral potential,
- it excludes the new road in Sections 6 and 8 (T6S, R22E)
- it excludes the northern one-half of Section 30 (T6S, R22E), which "dangles" in a way that would have made it difficult to manage as wilderness.

The proposed action boundary obviously has been drawn with the intent that it connect with the NFS boundary in Section 25 (T6S, R21E). It is essential for the integrity of both the Santa Teresa Wildernss and the Black Rock Wilderness that their boundaries connect in this area.

Gayle Hartmann
Rincon Group,
Grand Canyon Chapter of the
Sierra Club

REPORT ON THE NEEDLES EYE WSA #41A; SAFFORD BLM

On July 14th and 15th, 1983, two representatives of the Rincon Group backpacked through the Needles Eye WSA, in the Mescal Mountains north of Winkleman. The overall elevation of the area is quite low, so in order to best cope with the summer heat we travelled along Mescal Creek, a perennial stream in the western end of the WSA, from Pierson's ranch towards the confluence with the Gila River. Because of its beauty and relative accessibility it is likely that this would be the most frequented part of a wilderess area. By and large we applaud the BLM's proposal to designate most of the WSA as wilderness. A few comments follow.

Unlike most of the mountain ranges in southeast Arizona, the Mescals are composed of sedimentary rock- steeply dipping massive limestone beds. This causes a strikingly different and beautiful topography, obvious to the most casual observer.

Visible along Mescal Creek itself are the remains of a now collapsed limestone cave system. Looking up towards the cliff faces one sees many cave formations, including flowstone and stalactites, now exposed to the outside world.

Abundant and diverse riparian vegetation grows along the creek including cottonwoods, walnuts and many wildflowers. Many mosses and ferns thrive at the outlets of the many springs that flow along the creek. The BLM is actively encouraging and protecting the riparian habitat by building temporary barbed wire enclosures around seedlings, to protect them from cattle.

We saw many signs of wildlife along the creek, and the high point of our trip was an encounter with a bear, probably down at the creek for a drink.

There is a powerline running through the WSA, which has caused some controversy. On our hike we were amazed at how inconspicuous it really is, at least along the creek, and if we were not specifically looking for it, we might have missed it completely. This is due to the extremely rugged terrain, steep slopes and sinuosity of the creek. We don't believe that the powerline significantly detracts from the wilderness value of the area.

The specific BLM recommendation calls for excluding two areas from wilderness designation. One is on the east end and one is on the west. The western deletion, designed to follow ridgelines near Pierson's ranch, seems quite reasonable and acceptable. The amount lost is quite small and the improvement in manageability seems real.

138-17

The area on the eastern end seems more questionable. Instead of following the WSA boundary along the Gila, the BLM proposes to have the wilderness boundary follow a small drainage, supposedly to remove a vehicle way from the area. We have heard various reports on the condition and future of this way, but it is certainly not a major thoroughfare. We tried to visit that section in a 4-wheel drive vehicle to see for ourselves, but the Gila was flowing so high that access was impossible. Therefore we cannot judge whether or not deleting this area from the wilderness is justified, but the great difficulty in access to the supposed vehicle way leads us to believe that wilderness designation may in fact be appropriate.

Despite this minor question, overall we were very pleased with the BLM's information and research on the WSA, and their wilderness recommendation.

Jake Turin
2637 N. Palo Verde
Tucson, Az. 85716
323-3518
August 22nd.,1983

Day Mine Wilderness Study Area

Position Statement:

The Proposed Action Indicated In The Draft Wilderness EIS Would Not Designate As Wilderness Any Of Day Mine WSA's 16,629 Acres. "Though This WSA Meets The Basic Wilderness Criteria, It Would Not Be Designated Because Of Low Wilderness Values And The Presence Of Similar But Higher Wilderness Values In Nearby Fishhooks WSA."

138-18 This Empty Argument Directly Violates Wilderness Inventory Policy, Which States, "Any Type Of Rating Scale (High-Medium-Low) Must Be Avoided In Making The Assessment."

138-19 Furthermore, The "Nearby" Fishhooks WSA Is Actually Contiguous With Day Mine WSA. Day Mine And Fishhooks WSA's Both Have Superb Wilderness Values, The All Wilderness Alternative Is Definitely The Best Choice For Each Of These WSA's. Adoption Of This Alternative As The Proposed Action Would Greatly Enhance The Manageability Of These Lands As A Contiguous Region.

138-20 The Quality Of Natural Wilderness Values Is Well Described On p.29 Of The Draft EIS. "Outstanding Opportunities For Solitude Exist Throughout The WSA. The Area's Size, Shape Topography, And Vegitation Contribute To These Opportunities. The Cliffs Along The Southern Boundary, The Deep Canyons Throughout The Area, And The Pinyon-Juniper Forest In The Upper Elevations Of The Gila Mountains Offer Numerous Secluded Spots. Long Distance Views Of The Safford Valley And The Surrounding Mountains From The WSA's High Points Also Add To A Sense Of Isolation And Remoteness." This Blatantly Contradicts The Alleged Justification For Non-Designation, That Is "Low Wilderness Values."

The BLM's WSA Document Detail Day Mines' Superb Recreational Values. "Outstanding Opportunities For Primitive And Unconfined Recreation Are Present In The WSA. A Variety Of Activities Is Possible Including Hiking, Backpacking, Camping, Hunting, Horseback Riding, Birdwatching, Photography And Sightseeing For Botanical, Geological, And Zoological Features. The Topography And Vegitation Of The Gila Mountains Within The

WSA Enhances The Quality Of These Activities, It Is The Diversity And Quality Of The Primitive Recreation Opportunities In The WSA That Makes Those Opportunities Outstanding." Once Again, The Weak Argument Of "Low Wilderness Value" Is Directly Refuted By Official BLM Information.

138-20

Designation Of The Day Mine Area As Wilderness Would Greatly Enhance Diversity In The National Wilderness Preservation System. Wilderness Designation Would Expand The Diversity Of Natural Systems And Features. "The Day Mine WSA Is Located In Ecosystem 3140-28, Mexican Highlands Shrub Steppe Transition, As Defined By Bailey And Kuchler. The 3140-28 Ecosystem Is Not Currently Represented In The NWPS By Either Existing Statutory Wilderness Areas Or Administratively Endorsed Areas. There Are Only Three Areas Under Study That Are Potential Representatives Of This Ecosystem. All Three Study Areas Are In The Gila Resource Area. This WSA Represents An Excellent Opportunity To Expand The Diversity Of The NWPS By Adding An Ecosystem Not Now Represented And Having Very Few Potential Representatives."

138-20

Wilderness Manageability Of The Day Mine Area Could Be Improved By Acquiring One Small State Land Inholding Of 40 Acres And Also By Acquisition Of Another 640 Acres Of State Land Holdings Near The Northern Boundary Of The Area. These Aquisition Could Easily Be Facilitated By Land Exchanges Or Trades With The State Of Arizona. Both Parcels Are Identified For Acquisition In The 1978 Safford District Land Tenure Plan.

Significant Wildlife Resources Within The WSA Would Be Most Appropriately Managed Under Wilderness Designation. High Cliffs Provide Nesting Sites For Raptors. Upper Elevation Are Habitats For Big Game Such As Deer And Bear. The Left Fork Of Markham Creek Contains Riparian Vegitation Which Supports Important Wildlife Species. Riparian Enclosures Are Proposed (p. 44 DEIS).

Verified Sightings Of The Bald Eagle, Zone-Tailed Hawk, Black Hawk, Gila Monster, Coati, And Arizona Mountain Kingsnake Have Been Reported By The Arizona Game And Fish Department. All Of These Are Threatened, Endagered, And Sensitive Species Which Would Recieve Adequate Protection Under Wilderness Designation.

Wilderness Designation Of The Day Mine Area Would Accord Class I Visual Resource Status To The Panoramic Scenic Vistas Found Throughout The Area.

Serious Detrimental Impacts To
138-21 Existing Wilderness Values Would Occur Under The Currently Proposed Action. The Draft EIS States On Page 59 That, "...The Proposed Action Would Not Designate Any Of The WSA As Wilderness But Values Are Not Expected To Be Affected." This Assertion Is Blatantly Incorrect. The Area's Outstanding Opportunities For Solitude And Primitive Recreation Would Be Seriously Jeopardized, As Would The Area's Special Features Such As Scenic Vistas, Habitats For Endangered Species, Riparian Habitats, Nesting Sites, A National Register Archeological Site, And A Unique Ecosystem.

138-21 The Proposed Action "Could Lead To Future Exploration And Development By Removing The WSA From The Constraints Of The Interim Management Policy," As Indicated On Page 67 Of The Draft EIS.

Mitigating Measures Such As ONA Or ACEC Status Are Suggested To Reduce The Adverse Environmental Consequences Of Non-Designation Action As Proposed (p. 82-83 D. EIS) Such "Back-up" Alternatives For Wilderness Protection Will Not Be Adequate To Preserve The Unique And Fragile Ecosystem Of This Region. Sufficient Preservation Of This Immensely Valueable Area Will Require Wilderness Designation.

"Unavoidable" Adverse Impacts Are Discussed On p. 82 Of The Draft EIS. "Restricting Vehicle Access Could

Increase Opportunities For Solitude And Primitive Recreation, But Would Adversly Impact Motorized Vehicle Use. The Adverse Impacts Of Wilderness Designation On Mineral And Energy Exploration And Development Could Not Be Avoided." Enormous Portions Of Lands Presently Are Open To Motor Vehicle Use As Well As Mineral And Energy Development. Restricting These Consumptive User Groups From A Minute Fraction Of Available Lands Would Constitute Only A Minimal Overall Impact To These Interests.

The Action Which Has Been Proposed Would Not Designate As Wilderness Any Of The Day Mine Area. This Proposal Calls For Irreversible And Irretreivable Commitments Of Resources. "The Allocation Of Lands To Such Consumptive Uses As Mining, Motorized Vehicle Use, And Energy Development Would Result In Irreuersable And Irretrievable Losses Of Wilderness Values Over The Long Term. On The Other Hand, Wilderness Designation Would Preclude Future Development Of Commodity Resources But Not Irreversibly Or Irretrievably. Should A Vital National Interest Be Jeopardized By Wilderness Status, Congress Could Rescind Its Action And Allow The Needed Resources To Be Developed." (p. 83 - D.EIS)

In Conclusion, The Weak Argument Advanced For Non-Designation Is An Embarasing Indictment Of The Political Policies Of The Present Administration. The Information Provided By BLM Documents Has Contradicted The Argument Of "Low Wilderness Values" Over And Over Again, While Furthermore, Violating Its Own Policy By The Use Of Rating Comparisons.

Submitted By:
Mike Cease

Mike Cease
2039 E. 7th St.
Tucson, Arizona
85719
(602) 791-3590

Douglas Stephens
1216 N. Cherry
Tucson Az.
85719

First of all I would like to congratulate you on a well done, easy to understand Environmental Impact Statement. However I'am dismayed with the E.I.S!s obvious anti-wilderness bias. Time and time again throughout the context of the E.I.S. you make statements in support of all nine of the wilderness study areas as having high wilderness values. In fact when the E.I.S. is read from cover to cover one is left with the impression that the values, of the W.S.A.s, to the public as wilderness, far out weigh any conflicts such as manageability problems and O.R.V. use. When this seems to be the case, then why have so many acres of wilderness study been chopped out in your proposed action?

Now I realize the position of theB.L.M. and its commitment to compromise during the study of the lands under your jurisdiction, however this E.I.S. seems to leave the impression that the B.L.M. has chosen the easy way out during its consideration of land to be proposed as wilderness. I hope this will not be the case in your final E.I.S. Lets see more wilderness.

138-22

I would now like to refer to a specific W.S.A. under consideration, namely that of the Turtle Mountain W.S.A. your proposed action, as you well know, is no wilderness.You list several resons for this decision which I'am certain you are well aware of, however the validity of them to me seems questionable. For example the term "low wilderness values" seems to be a poor rationalization toward non-wilderness designation and the validity of this claim is not very sound. I myself know of no place where strict wilderness guidelines are writen as to what aesthetic qualities an area must have to be considered as wilderness, other than that it must provide opportunities for solitude, which is a quality that turtle mountain definitely provides and your E.I.S. states this on page 32 and throughout its context.

138-23

The E.I.S. states that a manageability problem exists at turtle mountain due to state and private land inholdings. May I suggest that the boundaries of turtle mountain W.S.A. be reexamined and redefined to eliminate the inholding problem. This is an alternative which I feel has not been pursued by the B.L.M.

138-24

And last youstated that conflicts withlocal ranchers in implementing a grazing system in the higher elevations of the W.S.A. influenced your no wilderness decision, yet at a local meeting in Tucson you stated that you would not condone such a system becouse the existance of cattle in the upper areas would conflict with big horn sheep now reestablishing themselves in the area. With this in mind wouldn't you agree that the designation of turtle mountain as wilderness would be a wise legislative decision to insure the protection and prosperity of an allready threatened species?

Once again I would like to congratulate you on a very well organized informative E.I.S. and thank you for taking the time to cooperate with the public on this issue, but I hope you will be as open minded as you were hospitable towards public and our opinions and as a result we will see more wilderness in the future.

Sincerely,

Douglas Stephens

Tim Vanderpool
1216 N. Cherry
Tucson, Az. 85712
881-7542

Summary of Points Concerning the Fishhooks/DayMine Areas

In the Fishhooks/DayMine areas, many irrelevant arguments were used by the BLM to facilitate their removal of the areas from WSA standing. Upon visiting the areas, Mike Cease and myself found that many of the arguments used against recommending the areas for wilderness designation were simply not true. Some of these arguments included:

1. The existence of cherry stem roads. In viewing these roads, and comparing the actual apprearence of these roads to the depiction of them in the E.I.S., I felt that there were gaping disparities. The actual visual impact of these roads were minimal. Many of them appeared not to have been used for quite some time. The view that they significantly distract from the wilderness value of the area is absurd.

138-25

2. The idea that, by comparing Day Mine to Fishhooks, and subsequently deeming Day Mine to have a lesser wilderness value, and using this as an argument to proprose the dropping of Day Mine from wilderness designation, is another of the many ridiculous ideas formulated by the BLM. How can these areas be compared when in reality, they are only separated by an artificial boundary, and when in fact, they are part and a continuation of, the same mountain range? It seems that you, the gentleman of the BLM, are clutching at straws on this one. Also, as Paul Hirt stated during the BLM hearing in Tucson, it is illegal to drop an area from wilderness study, or rather, to justify the dropping of said area from wilderness study by comparing that area to another siniliar area, and then deeming the former area as having inferior wilderness values.

3. The argument that Day Mine, as well as the lower part of Fishhooks, were the sites of numerous mining claims. Yet, not once during the hearing or at any other time, did the BLM state how many of these claim were still active. I think, considering the date that many of these claims were filed, that we

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can safely assume that a good many of the claims are inactive. The odds that most, if not all, of the claims will be further developed seems remote.

138-26

One more point that I would like to make concerns the boundary between the two areas. As it now stands, the boundary has no negative affect on the areas. However, in a worst-case scenario, should the Day Mine area be tragically dropped from wilderness study, and the lower part of Fishhooks remain intact, or vice-versa, the boundary would be totally unsuitable. It cuts almost directly through an ecosystem as it is now placed, running as it does along the wash. It presents an unnatural boundary between those creatures living on one side of the stream, and those living on the other. Regarding this boundary, I think that whoever proposed it should be required to go back to school and take Biology 101a.

In conclusion, I strikes me as extremely sad that such beautiful and interesting areas as Fishhooks and Daymine be dropped from wilderness designation. The more times I visit these areas, attracted by the extreme solitude to be found there, I find myself becoming more and more angry. I realize that these who are employed by the BLM are employed to do a job. Yet, what is the purpose of such a job when it goes against the good of the people that such agencies of the BLM were designed to serve. It is extremely disheartening to see the short-sightedness involved on the part of the government and the BLM as these beautiful areas are continuously pared away. What is the point? Are we really going to save enormous amount of the federal treasury by dropping these areas from wilderness protection? Or is the Reagan administration trying to make some sort of backhanded political point? And all at the expense of these irreplaceable areas. I ask you, gentlemen, as a concerned, frightened, and **incensed** citizen of this country, to use your conciences when making these decisions, before it's to late.

Peloncillo Statement

The MSA for the Peloncillo Mountains concludes with the recommendation that the Peloncillos be denied wilderness status. No wilderness was the chosen alternative because "the analysis revealed impacts to natualness, areas lacking outstanding opportunities for solitude and primitive recreation, problems with manageeablitiy, and problems withthe irregular shape of the WSA.

The wilderness characterisitics of the WSA are evaluated beginning on page 15 of the MSA. In the 12, 317 acres of the WSA, there are "eight fences, seven stock tanks, three short ways, two pipelines, one developed spring and concrete storage, one enclosure, two jet tanks, and a diversion dike." These impacts are related mostly to ranching activities, and grazing, according to the criteria set forth in the act of Congress, is not viewed as incompatible with wilderness designation. The MSA in fact concludes that "most of the WSA is natural with the imprint of man substantially unnoticeable." Despite the "substantially unnoticeable" impact of man, the MSA concludes that wilderness status not be recommended because "the analysis revealed impacts to naturalness."

In addition to being a very natural area, with little impact by man, the Peloncillos are alos suitable for solitude and primitive recreation. On page eighteen, the report states "Most of the WSA meets the requirements for outstanding opportunites for solitude or primitve and unconfined types of recreation." Yet the MSA concludes that "the analysis revealed...areas lacking outstanding opportunities for solitude."

138-27 The other two reasons for not rcommending wilderness designation concern problems with manageability and irregular shape. Given theshape of the Peloncillos, irregular boudaries of a wilderness area can never be totally regularized;however, as different agencies and governments own land and sub-surface rights both in and around the WSA, a land trade that would be beneficial to all parties could be worked out. It might be possible to trade without any purchasing. At the least, the possiblity should be thoroughly investigated before any decision is made.

Given the evidence as presented in the MSA, including points not discussed above, that is, the lack of recoverable minerals, oil or gas, and the minimal impact(and possible benefits)that wilderness designation would have socially and economically upon the local inhabitants, the Peloncillo WSA is a fine candidate for wilderness designation, and should be given every consideration for such by the Bureau of Land Managment.

Signed
Charles B. Greifenstein
Member of the Rincon Group
Sierra Club

RESPONSE — LETTER 138

138-1 Assumption 10 in the EIS (Chapter 4) is based on the Wilderness Management Policy (See Appendix No. 2) that states:

> Under the Clean Air Act (as amended, 1977), BLM-administered lands were given Class II air quality classification, which allows moderate deterioration associated with moderate well-controlled industrial population growth. The BLM will manage designated wilderness areas as Class II unless they are reclassified by the State as a result of the procedures prescribed in the Clean Air Act (as amended, 1977).
>
> According to the Clean Air Act, air quality reclassification is the prerogative of the States. The States must follow a process mandated by the Clean Air Act Amendments of 1977, involving a study of health, environmental, economic, social, and energy effects, a public hearing, and a report to the Environmental Protection Agency.
>
> Administrative actions within wilderness areas will comply with the air quality classification for that specific area.

With this as the basic policy by which wilderness areas will be managed, it was necessary to conduct the analysis consistent with this policy. This policy affects the analysis of the environmental consequences, and it is included in the list of analysis assumptions so the reader will have a more complete understanding of our analysis.

The map accompanying this input was not reproduced in this document. It is available for inspection at the Safford District Office.

138-2 The list of analysis assumptions properly belongs in the beginning of Chapter 4 where the environmental consequences of the alternatives are assessed. It is included there so the reader will have an understanding of the assumptions that guided the District's analysis. The Summary summarizes the entire document. That is why the assumptions were also there. They are listed only in the beginning of Chapter 4 in this document. Based upon the assumptions, the district determined no measurable impact would occur to air quality under any alternative.

138-3 See Response 102-10.

138-4 The purpose of mineral exploration is to establish the presence of mineral resources, the extent of the resources and their quality. It has not been established that the WSAs are poor exploration targets based upon unfavorable geology and unproductive exploration histories. In fact the research and analysis identified that the geology was, in many areas, favorable. Exploration histories are often only partially known as many companies and individual miners keep the results of their work confidential.

138-5 Our assessment of the adverse impacts are based upon the best available facts which, in the analysis of mineral resource potential, does include an assessment of probabilities based upon known values and existing geologic structures. These facts are included in Chapter 3, Minerals and Energy.

138-6 When information on mineral occurrences is not known for the land within the WSAs, the Bureau next assesses the mineral occurrences outside the WSA and evaluates the geological setting in which they occur. This method is a legitimate method of analysis of the mineral resource potential. While it will not identify with absolute certainty that a resource exists in a certain location, it can lead to exploration of the area. It is a common method and the method that guided BLM in its analysis of impacts on mineral exploration.

138-7 BLM has revised the geothermal energy temperature figures for Gillard Hot Springs to a range of 135°-150°C. See text, Chapter 3. Temperatures in this range provide more potential for direct use applications than development of large scale commercial electrical generation. On June 17, 1982, two tracts totalling 2,920 acres in the Gillard Hot Spring area were offered for competitive lease. No bids were received.

138-8 The reason for the contingency recommendation for Black Rock was that BLM felt it would make a significant addition to a larger wilderness in the Santa Teresa Mountains. The district did not feel the quality of the wilderness resource of the WSA was so outstanding it should be wilderness if the Forest Service roadless area was not. So the recommendation for wilderness was made only if the contiguous Forest Service roadless area became wilderness. In the draft EIS, the same approach was not taken with the Peloncillo Mountains WSA because of uncertainty that the necessary acreage of state land could be acquired. Since the preparation of the draft EIS the land exchange program with the state has begun and BLM has completed several exchanges, including an exchange involving the state land you refer to in the Peloncillo Mountains. The transfer of land was not complete in quite enough time to incorporate the additional acreage into this analysis. BLM can consider wilderness suitability in future RMPs. The BLM is beginning an RMP for this area in fiscal year 1987.

138-9 The Wilderness Study Policy (BLM 1982c) requires the assessment of land ownership pattern (status) and its effect on the manageability of an area as wilderness. Inholdings may be sufficient reason to recommend an area nonsuitable, as happened in this case.

138-10 See Response 101-2. The $75,000 figure has been revised (see Impacts to Economic Conditions in Chapter 4).

138-11 See Response 15-1 and 96-2.

138-12 Geothermal development would depend upon the nature of the resource. It does not appear the temperatures of the known springs would warrant more than direct heat application.

138-13 See Response 68-1.

138-14 See Response 68-2.

138-15 None of the mining claims in Sections 5, 6, 7 and 8, T. 6 S., R. 22 E., have been patented.

138-16 See Response 87-2.

138-17 See Response 102-6.

138-18 See Response 31-1.

138-19 Day Mine and Fishhooks WSAs are not contiguous but are separated by the Day Mine Road (No. 4004) — a maintained road on the BLM transportation plan. This route meets the definition of a road and thus forms the boundary of the two WSAs.

138-20 See Response 31-1.

138-21 The EIS states that under *No Wilderness* there would be minimal impacts on wilderness values. This conclusion was reached because the land uses expected to occur in the WSA under this alternative (see Day Mine, Chapter 2) would have temporary or small scale, isolated impacts on wilderness values.

138-22 See Response 31-3.

138-23 The *Enhanced Wilderness* alternative for Turtle Mountain WSA was intended to reduce conflicts with inholdings and geothermal energy potential. However, the problem of inholdings is difficult to eliminate without creating other manageability problems. In an effort to eliminate inholding problems, yet maintain as much wilderness acreage as possible, the eastern boundaries of the wilderness under this alternative would be along section lines rather than topographic features. While this boundary would exclude most inholdings from the wilderness, wilderness values would be better preserved and managed if boundaries followed natural topographic features such as ridgetops or creek bottoms. This boundary also excludes the lower portions of the drainages that flow from Turtle

Mountain eastward to Eagle Creek. All that would remain wilderness would be Turtle Mountain and the upper ends of the drainages. Providing access to these inholdings is a real problem. During the course of the wilderness study, access was provided, upon request, to a lessee of the State of Arizona to Section 2, T. 5 S., R. 28 E.

138-24 The livestock operator would like to develop range improvements to facilitate livestock use in the higher elevations of the Turtle Mountain WSA. However, it is BLM's responsibility to provide for the management of wildlife habitat as well as livestock in the Turtle Mountain WSA, while maintaining the wilderness values of the WSA. The planned livestock improvements are critical not only to the livestock operator but to BLM for sound resource management. Currently, livestock use is poorly distributed throughout the allotment, with heavy use in canyon bottoms (adversely affecting vegetation, soils, wildlife and water) but little or no use on the side slopes and ridgetops. The goal is to properly distribute livestock throughout the allotment, for which additional waters and fences are needed.

At the meeting in Tucson, BLM pointed out that not only was there a conflict between livestock and wilderness values, but also a conflict between livestock and wildlife values on the Turtle Mountain ridgetops. It was not stated that BLM would not condone such a livestock system.

138-25 See Response 31-1.

138-26 The boundary that separates Day Mine WSA from Fishhooks WSA is the Day Mine Road — a road on the BLM transportation plan. Regardless of its effect on adjacent WSAs or its location in an ecosystem, it is still the road that forms the southeastern boundary of Fishhooks WSA and the northwestern boundary of Day Mine WSA. The boundary of the area recommended for wilderness in Fishhooks WSA has been expanded southward to the ridgetop to include all of the Dutch Pasture Canyon drainage.

138-27 See Response 138-8.

139*

IN PROTEST TO THE LISTED AREA.

To Whom It May Concern:

Wilderness, roadless and undeveloped area
U. S. Forest Service and Bureau of Land Management

Coronado National Forest
Santa Teresa Mts.
Black Rock Area

Bureau of Land Management
AZ - 4 - 8
Black Rock Area

R. B. Tippiconnic
Cecil R. Sims
301 West Congress
Tucson, AZ 85701

District Manager
Lester Rosenkrance
425 E. 4th St.
Safford, AZ 85546

We are the Lloyd L. Glover and JoDean Blair Glover family residing in the above listed area for many years. We are opposing both the U. S. Forest Service and the B. L. M. putting the land into wilderness, roadless area.

139-1 Our past legal history shows the family using the area before the government put U. S. Forest Service and B. L. M. boundaries up. We have not received any legal statement that it will not cut or grazing privileges.

139-2 Our patented land is in the middle and connects the Forest Service and the B. L. M. land. The wilderness in that area cannot be reached without crossing or parking on our private property. No buffer zone area, between our land on listed areas has been set aside. We have to cross the last mineral strips that Udall gave back to the Indians, and there is no guarantee they won't close the road or even let us maintain it.

There is no need for a wilderness, roadless area to be established, because nothing can be done on the land without permission from the Forest Service or the B. L. M.

The general public doesn't know we have any private land in that area or any legal rights.

Sincerely,

Lloyd L. Glover
Lloyd L Glover
JoDean Glover
Jo Dean Glover

Signatures of protesters on page enclosed.
Original copy of signatures is in the possession of
the Lloyd Glover and JoDean Glover families.

SIGNATURE	ADDRESS	OCCUPATION
Sally Owens	1220 Relation St.	none
Ray [illegible]	[illegible]	[illegible]
Bob Shiflet	1604 W. Relation	Sales
[illegible] Moody	Rt 1 Box 281	[illegible]
Louise Pollock	1326 11th Ave Safford	Housewife
Webster Pollock	1326 11th ave Safford	Retired
Eleanor Claridge	1320 11th ave.	retired
Jean Jauley	1304 11th Ave	~~Self~~ Bookkeeper
Cherie Valentine	1214 11th Ave	Housewife
Dean T. Nolan	1219 - 11th AVE	BANK MGR.
Tammy Nolan	1219 11th Ave	Housewife
Barry Goodman	1220 11th Ave	~~[illegible]~~ Auto Dealer
[illegible] L. Davis	1301 11th [illegible] E	Safford, Az. 8554
Francis M. Dugie	1212 SANTA FE ST.	SAFFORD AZ. 8554
Betty L. Dugie	1212 Santa Fe St	Safford Az. 85546
Carl P. Davies	1301 11th Ave	Safford AZ 8554
Donna Hughes	1307 11th ave.	Safford, Az. 855
Frank P. Hughes	1307 11th Ave	Safford Az 855
Ray Curtis	1264 ALAMEDA	SAFFORD Az 855
Gayla Curtis	1264 Alameda	Safford, Az. 8554
Phyllis Wilkin	1407 14th [illegible]	Safford, Arizona 8554
[illegible]	1409 W Relation	Safford 8554
[illegible]	17 Benita	Safford
C. A. Wales	1901-20th ave Safford	Retired
[illegible] A. Crotts	107 Yuma	Morenci - P.O.
Mrs Jan Crotts	107 Yuma	Morenci - P.O.
Paula Whitsell	105 Yuma Morenci	- housewife

RESPONSE — LETTER 139

* This statement was signed by 566 individuals. All signatures are not reproduced in this document but are available for inspection at the Safford District Office.

139-1 See Response 16-2.

139-2 See Response 87-2.

140

MARSHALL STEED
8117 N. 18TH PLACE
PHOENIX, ARIZONA 85020

BLM
DISTRICT MANAGER
425 E. 4TH STREET
SAFFORD, ARIZONA 85546

I HAD THE OPPORTUNITY THIS EARLY SUMMER TO FLOAT DOWN THE GILA BOX. I NOW UNDERSTAND THAT THE AREA IS UNDER STUDY FOR A WILDERNESS AREA. I DO FAVOR WILDERNESS STATUS FOR THE GILA BOX. IN FACT THE AREA I DO FAVOR FOR THIS STATUS IS THE 17,831 ACRES OF THE GILA BOX. I HAVE FLOATED RIVERS IN MOST OF THE WESRTERN STATES AND ALASKA, BUT WHAT I SAW AND EXPERNICED DOWN THE GILA BOX WAS THE ULTIMATE. THE GILA BOX IS A AREA THAT IS COMPLETLEY UNDISTRUBED BY MAN. I WAS COMPLETLEY TAKEN BY THE PEACEFULLNESS OF THE AREA. THE GEOLOGY OF THE AREA WAS LIKE A FIELD TRIP INTO TIME. THE CHANCE OF SEEING SUCH DEPOSITS OF THE PLIOCENE AND PLEISTOCENE IN A RIVER IS A CHANCE OF A LIFETIME. THE GILA CONGLOMERATE WAS A EXPERIENCE OF ITS OWN. SINCE I HAD NEVER BEEN DOWN THE RIVER BEFORE. I WAS EXPECTING A VERY DULL UNEXICTING TRIP DOWN A VERY SPARSLEY LANDSCAPED RIVER. I WAS SO WRONG THE FLORA OF THE RIVER WAS INCREDITABLE. IT SEEMED IT CHANGED AT EVERY BEND. THE NIGHT WE CAMPED WE CAMPED UNDER A GROUP OF BEAUTIFUL PALO VERDES THAT WERE SO GREEN IT WAS HARD TO DESCRIBE. THE CHANGING OF THE FLORA FROM DESERT TO LUSH COTTONWOODS AND OAK WAS INCREDIABLE. I WAS ALSO AMAZED AT THE WILDLIFE IN THE AREA TOO. THE BIRD LIFE WAS AMAZING I HAD A CHANCE TO SEE A BLACK HAWK AND A ROADRUNNER IN A FIVE MINUTE PERIOD, IT SEEMED THIER WERE BIRDS EVERYWHERE. THE GILA BOX IS A AREA THAT HAS TO SURVIVE. TO LET THIS AREA NOT TO BE SAVED WOULD BE A CRIME. THIS AREA HAS SURVIVED FOR HUNDREDS OF YEARS WE MUST LET IT SURVIVE FOR OUR GENERATIONS TO FOLLOW. THIS AREA CAN'T BE DUPLICATED. SO PLEASE KEEP THIS IN MIND. AGAIN I WANT TO SAY TO EXPERNICE THE GILA BOX IS A CHANCE OF A LIFETIME. LETS KEEP IT THAT WAY FOR THE FOLLOWING GENERATIONS.

Marshall Steed

CC: INT.DEPT.
SEN.DECO
BLM HEAD

141

INSTITUTE FOR RAPTOR STUDIES

Box 4420, OM Star Route
Oracle, Arizona 85623

30 August 1983

Lester Rosenkrace, Dist. Manager
Safford District Office
Bureau of Land Management
425 East 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrace:

This evening I was invited to give my comments concerning the proposed consideration of several remote areas on your district for wilderness status. By way of introduction I should say that I have made repeated visits to all of these sites by air and have visited four of them on the ground one to several times. I consider all of them scenic areas and all include excellent breeding habitat for many species of birds of prey. All are potential wintering habitat for the endangered peregrine falcon and some are likely summering zones for this species as well. All of these zones contain cliff areas and two have riparian zones which are of special import to southwestern wildlife communities including the birds of prey.

If we consider importance of the zones for birds of prey nesting habitat (weighted in favor of the rarer species) their order would be approximately as follows: Black Rock, the Gila Box and the Needle Eye all rank high. Turtle Mountain and Dos Cabesas are important zones for eagles and hold good potential for rarer species. The other zones (Fishhooks, Daymine, Javeline Peak and the Peloncillo Mountains) are important for eagles, prairie falcons and the commoner species but hold little potential for the rare or unique Arizona forms.

I believe all of these areas contain samples of the kinds of habitat that are relatively limited in Arizona and are therefore worth retaining or restoring as roadless zones. As you are aware, some of these areas already have excessive public access. Some zones would probably require closures to four-wheel drive traffic, others (e.g. Black Rock) probably would of necessity remain accessible by country road.

I hope these comments are of help. More detailed comments could be made to specific questions about each area. Thank you.

Sincerely,

David H. Ellis, Ph.D.
Research Director

DHE:che

142

8-26-83

District Mgr. of Bureau of Land Management
425 E. 4th St.
Safford, Az. 85546

Dear Mr. Rosenkrance,

Please accept this input toward the environmental impact statement on Gila Box. As a conservationist and a nature lover, I strongly wish to see the 17,831 acre Gila Box Wilderness.

142-1 The inclusion of ORV use in this area would, without a doubt, destroy the natural habitat of much of the wildlife and mar the natural beauty of this area. Gila Box is one of my favorite spots to pursue my hobbies of hiking and river rafting. I achieve a renewal of the spirit in the peacefulness of this natural setting. The noise and destruction caused by ORV's would make this area worthless for my pursuits.

According to Arizona's Governor Bruce Babbitt, "Wilderness is one of the few meaningful gifts we can leave future generations. If we err, let it be on the side of generosity to the spiritual, esthetic, wildlife, and wilderness values involved."

Sincerely,

Kay J. Adams
P.O. Box 382
Anza, Ca. 92306

RESPONSE — LETTER 142

142-1 See Response 1-2.

143

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

AUG 31 1983

Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 E. 4th Street
Safford, AZ 85546

Dear Mr. Rosenkrance:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled PROPOSED WILDERNESS PROGRAM FOR THE SAFFORD DISTRICT WILDERNESS EIS AREA, ARIZONA AND NEW MEXICO. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2 (lack of objections - insufficient information). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Acting for
Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical, and
Resources Management

Enclosure (1)

Water Quality Comments

143-1 On page 55 the DEIS states that no measurable impacts would occur to water resources. Considering that there are water resources in the EIS study area and that nondesignation of WSAs may result in increased mining, energy (geothermal) and grazing activities which have the potential to degrade water resources (i.e., due to heavy metals, toxics, waste discharges, sedimentation, bacteria, supply problems, etc.), the FEIS should acknowledge the potential for greater impacts to water quality under nonwilderness versus wilderness designation. A discussion of the potential for surface and ground water impacts should not be deferred to a future project specific environmental assessment, but must be addressed under Environmental Consequences, as indirect effects related to induced changes in the pattern of land use (40 CFR 1502.16).

143-2 Specific WSAs of concern are Day Mine, Gila Box and Turtle Mountain. For example, the DEIS states that in Day Mine the Left Fork of Markham Creek provides important riparian habitat; Gila Box contains the 'last free-flowing stretch of the Gila River in Arizona' and uncommon riparian habitat, and; Turtle Mountain drains to the Gila River, Bonita Creek and Eagle Creek and has hot springs. How may impacts to surface and ground water quality and riparian vegetation differ under the various alternatives?

143-3 It is unclear why no portions of these areas which have outstanding opportunities for solitude and primitive recreation and valuable special features are being recommended for wilderness designation.

RESPONSE — LETTER 143

143-1 There could be adverse impacts to the water resource under the *No Wilderness* alternative from mining, grazing or energy development. However, the district believes these impacts would be avoided because federal and state laws and BLM policy and regulations would prevent significant adverse environmental effects to the water resource. Additional analysis of water resources is included in Chapters 3 and 4 of this document. For inventory data on water sources in each WSA, see Appendix No. 1.

143-2 See Response 143-1. Impacts to water quality and riparian habitat would be minimized under the alternatives that provide wilderness management. Adverse impacts would be more likely under *No Wilderness* because of possible surface-disturbing activities (see Vegetation, Chapter 4).

143-3 The EIS has been reworked to provide additional information, analysis and clarity. The BLM believes the data and analysis support the recommendations. For further understanding of the decisionmaking process, see Response 31-1 and 31-4.

144*

John R. Swanson
P.O. Box 922
Berkeley, Calif. 94701

August 23, 1983

District Manager
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Dear Sir:

Please accept my comments, as follows, concerning -
-Safford District Draft Wilderness Environmental Impact Statement

The Wilderness resources of this Safford District are very substantial and must receive complete and permanent protection as they benefit Man and all life on this beleaguered World.

Such lands as administered by the Bureau of Land Management, Safford District, contain not only outstanding Wilderness resources but scenic, wildlife, botanic, and cultural resources, also outstanding. Very important segments of our nations' natural heritage. Areas that provide vital refuge for all life, including Man, on this endangered planet.

I urge that the following areas; Bureau of Land Management, Safford District, receive Wilderness classification, and are added to our National Wilderness Preservation System at this time. - acreage included -

o	Needle's Eye	12,500
o	Black Rock	9,250
o	Fishhooks	25,000
o	Dav Mine	29,000
o	Gila Box	26,000
o	Turtle Mountain	22,000
o	Javelina Peak	33,000
o	Peloncillo Mtns.	15,500
o	Happy Camp Canyon	22,000
o	Hoverrocker	2,950
o	Bowie Mountain	6,750
o	Baker Canyon	5,000
o	Galiuro Addition No. 3	750

o Additional Wilderness acreage in this Safford District to total some 115,000 acres, or more, also to be added to our National Wilderness Preservation System. A grand total of 335,000 acres, at least.

To acquire all inholdings on all Public Lands.
To permanently ban all forms of surface and sub-surface development in all current and potential Wilderness.
With No-Release of any Roadless and Wilderness Study areas, as they are to be added as Wilderness.

For when we save Wilderness; we save America.

Sincerely,

J.R. Swanson

* Letter 144 has been typed because the original was difficult to read when it was reduced for this EIS. The BLM believes this to be an accurate reproduction of the original letter. The original is on file in the Safford District Office.

145

DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
630 SANSOME STREET - ROOM 1316
SAN FRANCISCO, CALIFORNIA 94111

REPLY TO ATTN OF: ROV (Cox, 556-6439)

SUBJECT: Safford District Draft Wilderness Environmental Impact Statement (EIS)

TO: Mr. Steve Knox
EIS Team Leader
Safford District Office
Bureau of Land Management
425 East 4th Street
Safford, AZ 85546

145-1

1. We have reviewed the Draft Wilderness Environmental Impact Statement (EIS) for the Safford District and find no reference to issues or actions which could affect Air Force activities in this region. We do, however, offer the following general comments:

a\. These areas have, in the past, been subject to military overflights which should continue in the future. Historically, there have not been any problems between the Air Force and the Bureau of Land Management concerning potential conflicts between military overflights and wilderness designations. We, therefore, concur with any of the alternatives your agency designates, provided no restrictions are placed on military overflights in wilderness areas.

b\. There are certain aspects of the alternatives mentioned which we would be less inclined to support because areas which are appropriate for military overflights and low altitude training routes are becoming increasingly rare. Desirable characteristics include: relatively isolated locations of sparse populations, areas presently under Federal jurisdiction, diverse topography, and areas which lack heavy commerical activities such as mining.

Therefore, the Air Force would support the alternative (or alternatives) which increase wilderness designated acreage; provided no restrictions are placed on military overflights.

2. We appreciate this opportunity to comment on the Draft Wilderness EIS for the Safford District.

W Edward Fischer
W. EDWARD FISCHER
Deputy Regional Civil Engineer

RESPONSE — LETTER 145

145-1 U.S. Air Force training flights are addressed in Chapter 3 of the EIS under the Noise section. The impacts of the noise of overflights are addressed throughout Chapter 4.

146

McEUEN'S STORE
Firearms - Ammo - Hardware - Groceries - Petroleum Products
BOX 156 ★ FT. THOMAS, ARIZONA 85536

Bureau of Land Management
425 E. 4th St
Safford, AZ. 85546

Dear Friends!

I have had several of my Neighbors in, wanting me to write you a letter protesting the putting of Day Mine, The Fish Hooks & The Black Rock Ranges in the Wilderness Area.

I, being an old timer here, would Recommed that these Areas be left as is.

Thank You.
J.M. McEuen

147

September 6, 1983

Mr, Kurt Kotter
Office of the Bureau of
Land Management
425 East Fourth Street
Safford, Arizona

Dear Sir:

Please add my name to the list of those that oppose making Black Rock, Upper Fish Hooks and Day Mine a part of the wilderness area.

147-1 Being a sports enthusiast, I enjoy having these areas available for hunting for those of us that live in this immediate area.

It is my feeling that enough land has been set aside for wilderness areas and several of my close friends and family members have developed this area and I would like to see it remain in their care.

Sincerely,

Jerry W. Hancock

Jerry W. Hancock
Ft. Thomas, Arizona

RESPONSE — LETTER 147

147-1 The Wilderness Management Policy (See Appendix No. 2) states that hunting is permitted in designated wilderness areas, subject to applicable federal and state laws and regulations governing hunting.

148

September 6, 1983

Mr. Kurt Kotter
BLM Office
425 East Fourth
Safford, Arizona

Dear Mr. Kotter:

I am opposed to designating the Day Mine, Upper Fish Hooks and Black Rock areas as wilderness areas.

This action always seems to bring into the area an undesirable element that we would rather not have in our community.

This land has been developed and cared for by area farmers and ranchers that make their livelihood from the land.

Any assistance that you can render to our community in this matter would be appreciated.

Sincerely yours,

Jo Hinton
Jo Marie Hinton
P. O. Box 188
Fort Thomas, Arizona

149

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

IN REPLY REFER TO:
OEPR-OHL-HBPS
Cooperative Studies
EIS Review
Wilderness Designation
of Areas in BLM's
Safford Oistrict

SEP 2 1983

Mr. Lester K. Rosenkrance
District Manager
Bureau of Land Management
425 East 4th Street
Safford, Arizona 85546

Reference: 8500

Oear Mr. Rosenkrance:

This is in response to your letter of June 1983, requesting our comments on the draft environmental impact statement (DEIS) for the wilderness designation of wilderness study areas in the Safford District in Cochise, Gila, Graham, and Greenlee Counties, Arizona and Hidalgo County, New Mexico.

The Bureau of Land Management (BLM) is directed by the Federal Land Policy and Management Act of 1976 to review roadless areas of 5,000 acres or more having wilderness characteristica and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. This OEIS assesses the environmental consequences of managing as wilderness nine wilderness study areas in BLM's Safford Oistrict.

We have reviewed the DEIS to determine the effects of the wilderness designation on matters affecting the Federal Energy Regulatory Commission's jurisdictional responsibilities under the Federal Power Act, Natural Gas Act, and other legislation.

Our review indicates that there are no existing nor known potential hydroelectric power projects in the wilderness study areas. In addition, the wilderness designation of these areas would not have a significant effect on natural gas facilities or hydrocarbon resources.

We hope our comments will be helpful to you in the preparation of the final environmental impact statement.

Sincerely,

Lawrence R. Anderson
Lawrence R. Anderson, Director
Office of Electric Power Regulation

150

YUMA AUDUBON SOCIETY
YUMA, ARIZONA 85364

Sept. 4, 1983

District Manager
Safford District Office
Bureau of Land Management
425 East 4th St
Safford, AZ 85546

Yuma Audubon appreciates the opportunity to review the Draft EIS for the Proposed Wilderness Program in the Safford District. Following are our comments:

COMMENTS SPECIFIC TO PARTS OF THE TEXT:

150-1 1. Page 2, Environmental Consequences #12: A contingency plan defining BLM's course of action if funding is not available would be desirable and is a more realistic approach than just assuming the money will be there.

150-2 2. Page 17, Gila Box: In the description of this area's wilderness values on page 26, no mention of a conflict with ORV use is mentioned. This narrative says the WSA is 'natural with most of the few imprints of man in the uplands and near the WSA boundry. This conflicts with the analysis on page 17. What's the real story? We feel that unless the canyon bottom has been severely damaged by heavy ORV use, this should not be reason for excluding the WSA from consideration.

In addition, a provision could be written into the wilderness proposal to allow for vehicular access to complete riparian revegetation thus eliminating this conflict between management and wilderness.

150-3 3. Page 19, Economic Considerations: We are interested how you calculated the decline in spending due to decreased ORV use, and in what units is this figure - dollars per what unit of time? We find it hard to believe that wilderness designation would have any effect on spending for ORV recreation. Recreationists interested in off-road vehicle play will simply go elsewhere if they are prohibited from entering the Gila Box WSA (your own analysis concurs with us - see page 80). Even if a $37000 per annum decrease in spending did occur, we feel this impact is insignificant in light of the benefits which would accrue from wilderness designation in terms of non-quantifiable amenities such as non-game wildlife and the quality of recreational experience available in the Gila Box area.

4. Page 43, Riparian Vegetation: Because of the importance of riparian zones to many sensitive species, cattle should be excluded from significant riparian areas. At the very least, holders of allotment leases should pay for the cost of regenerating overgrazed riparian woodland.

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5. Page 44, Table 3-9: This table once again shows the value of the Gila Box area. These values should not be comprimised by failure to recommend it as wilderness.

150-4 6. Page 75, first paragraph: Perhaps other groups would be able to donate time and labor to these regeneration projects. Yuma is a long way from Gila Box, but perhaps other Audubon or Sierra Club chapters in your area could help. If you are really in need of volunteers, Yuma Audubon may be able to help as well.

GENERAL COMMENTS:

Yuma Audubon favors the Enhanced Wilderness alternative for the following reasons. From Table 2-2, page 19,this alternative would benefit threatened and endangered plants, cultural resources, visual resources and wilderness values to a greater degree than either the moderate wilderness or proposed alternatives. It would also be more beneficial for non-riparian wildlife and revegetation of the Gila River could be written into the wilderness recommendation for the Gila Box. ORV use would be less than in the proposed alternative, but as your own analysis pointed out this use would probably shift to another area reducing or eliminating any adverse impacts to this type of recreation and the monetary benefits it generates. State and private inholdings may cause some administrative problems, but these could be dealt with through land exchange or cooperative management agreements. Furthermore, the impacts to mineral exploration and mineral development, according to your analysis, are not any greater in the Enhanced alternative when compared to the moderate wilderness or proposed alternatives.

Summarizing, it is not clear why the Enhanced Wilderness alternative was not selected as the proposed action. The Enhanced option would yield much greater benefits than the proposed alternative, but its costs, quantifiable and non-quantifiable are only slightly greater.

Finally, the choice of which alternative to implement should take into account the demand for wilderness. This demand is growing as more and more people recognize the recreational potential of wilderness. Coupled with the rapid expansion of Arizona's urban centers and the accelerated development of our wild and natural areas, these factors all indicate a need to set aside today sufficient wilderness acreage of an ecologically diverse nature to meet these demands now and in the future. Already some wilderness areas near Phoenix are experiencing overcrowding and under current management use will exceed capacity in all wilderness areas in the Tonto National Forest by the year 2000 (Tonto N.F. 1982. Draft EIS and Proposed Plan). We feel that future demands for wilderness in Arizona could be met in part by the Enhanced Wilderness option for the Safford District and at the same time impacts to economic and social concerns would be kept to a minimum.

Sincerely,

Jim Rorabaugh
Conservation Chairperson

Cary Meister
President, Yuma Audubon

RESPONSE — LETTER 150

150-1 This assumption was made for consideration of the management of an area to preserve its wilderness values. We believe it to be a logical and correct assumption.

150-2 The purpose of the description of the wilderness values in Chapter 3 is to identify the WSA's wilderness values, including those factors that influence the values. The district did not feel the existing ORV use was physically impacting the wilderness values, but did admit, however, the roar of an ORV echoing up the canyon would affect, to varying degrees, the solitude a visitor would experience. ORV use was discussed in the Recreation portion of Chapter 3. The analysis does not conflict. The purpose of Chapter 3 is to identify the resources, not address conflicts between uses. Chapter 4, Environmental Consequences, addresses conflicts between resources. In Chapter 4 you will see a discussion of the wilderness-ORV conflict in the Gila Box. Chapter 4 is consistent with the analysis in Chapter 2.

150-3 See Response 101-2.

150-4 See Responses 15-1 and 96-2.

151

United States Department of the Interior

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY REFER TO: LC-154A
120.1

SEP 15 1983

Memorandum

To: District Manager, Bureau of Land Management, 425 E. 4th Street, Safford, Arizona 85546

From: ACTION Regional Director

Subject: Safford District, Draft Wilderness Environmental Impact Statement (DES 83/36)(your letter to the Director, Office of Environmental Affairs dated June 1983)

We have reviewed the subject document and offer the following comments.

151-1 Page 2 - Change No. 7 to "Camelsback Dam is an authorized project of the Corps of Engineers and is being restudied under the Camelsback Dam Study."

Page 17 - The Gila Box area appears to be one of the higher value Wilderness Study Area's (WSA's) in the Safford District. The area has several native fish species, a diversity of wildlife including wintering bald eagles, and valuable riparian habitat. Regardless, it was dropped from consideration for wilderness designation due to conflicts with Off Road vehicle (ORV) use in the canyon bottoms. On page 61 of the subject document, it is stated that designating a "moderate wilderness" status for this area would "reduce the manageability problems caused by ORV's...." In view of the high wilderness values of this area as outlined in the Environmental Impact Statement (EIS), this status would seem more appropriate than the proposed action of a "no wilderness status."

Page 18 - In view of the high wilderness values described for the Peloncillo Mountains WSA, the proposed action should be reevaluated and a designation of "enhanced wilderness" should be considered.

151-2 Page 23 - The paragraph on water should include a brief discussion of water resources and future water development (i.e. Camelsback Dam).

151-3 Page 44 - It should be stated that the reintroduction of the razorback sucker into the Gila River is a joint effort by the Arizona Game and Fish Department (AGFD) and the Fish and Wildlife Service (FWS).

151-4 Page 46 - Table 3-11, Cultural Resources needs to be clarified. For example, the Black Rock and Turtle Mountain WSA's appear to be similar in number of sites but are ranked differently.

151-5 Page 55, No. 7 - The interdisciplinary team's assumption that Camelsback Dam or alternative will not be built does not answer the questions of how future land management discussions would affect, or be affected, by other proposed plans. The Bureau of Reclamation (Reclamation) and the Corps of Engineers (Corps) were not included in any coordination or consultation (page 87). A major portion of the Gila Box WSA is within the proposed Camelsback Dam area. Although wilderness designation is not being proposed, the discussion of the wilderness alternatives should include some discussion of possible impacts to the proposed Camelsback Project. We suggest the paragraph reads as follows: "The Army Corps of Engineers and the Bureau of Reclamation are jointly studying the Upper Gila River Basin for flood control and water supply. The Camelsback Dam site is being considered for flood control. If current studies determine the site to be suitable for flood control, more studies such as design and cost will be conducted to select the preferred alternative. The preferred alternative will be selected in May of 1984. Without knowing if a structure will be built, what type of structure it will be, or where it will be built, environmental consequences cannot be assessed."

151-6 Page 55 - It is stated in the introduction that there will be no measurable impact to vegetation, yet it is previously stated that grazing is eliminating broad leafed tree seedlings and leading to succession by brush in some riparian areas.

151-7 Page 74-75 - There needs to be further discussion of the possible impacts to wildlife in a "no wilderness" status. For example, the effect of ORV's and future grazing affects on wildlife. Why was the Gila Box WSA the only WSA discussed?

151-8 Page 79-80 - Designating the Gila Box as wilderness could have significant economic impacts on future water development and improved flood control features of proposed projects in the area.

151-9 Page 87 - The statement"....BLM found that no officially approved resource related plans of state, local or other federal agencies would conflict with wilderness designation of any of the WSA's" is incorrect. Consultation with the FWS, AGFD, and Reclamation would have revealed potential conflicts. We recommend that these agencies be consulted prior to finalization of this document.

John D Brown

RESPONSE — LETTER 151

151-1 See Assumption No. 7, Summary.

151-2 See text, Chapter 3.

151-3 See text, Chapter 3.

151-4 Black Rock WSA and Turtle Mountain WSA did have approximately the same number of known sites. The difference is in the potential for additional sites to be present, and the significance of those sites. *Site Potential* can be defined as the probability for other sites to be found in the WSA. *Resource Significance* is a measure of the value of the sites. A site with high significance will provide more data and contribute a greater understanding of past cultures than a site with lower significance. Since preparation of the draft EIS, an additional prehistoric site has been found in Black Rock WSA and an additional historic site has been recorded in Turtle Mountain WSA.

151-5 See Assumption No. 7, Chapter 4. The Bureau of Reclamation and the Corps of Engineers have been listed in Chapter 5 as federal agencies from which BLM requested comments. In addition, BLM has talked with both agencies on several occasions in the preparation of this document.

151-6 The district has determined that neither the *Proposed Action* or any of the alternatives would have a significant adverse impact on vegetation. In certain instances, such as livestock grazing on broadleaf riparian seedlings, the impacts are measurable. With or without wilderness management in the EIS area, however, livestock would continue to graze in these WSAs. BLM's responsibility is to assure proper forage utilization levels and, if individual problems develop, to correct them.

151-7 Chapter 4 has been reworked to include further analysis and detail of the impacts to all resources and uses. See text.

151-8 See Assumption No. 7, Chapter 4.

151-9 No officially approved and adopted resource-related plans (state, local or federal) were found that conflicted with wilderness management. We have requested comments from the Fish and Wildlife Service, Bureau of Reclamation, Corps of Engineers, and Arizona Game and Fish Department and their input is being incorporated into the final EIS. It is important to remember that specific parts of a resource management plan may conflict with wilderness management while overall the basic management direction of an agency may be consistent with wilderness management. Individual BLM resource management programs (range, wildlife, recreation, etc.) are good examples of this conflict. BLM's overall management direction, however, includes management of wilderness.

Public Hearing Transcripts

Following are the transcripts of the wilderness public hearings held in Safford, Tucson and Phoenix, Arizona and Lordsburg, New Mexico. Comments pertaining to the adequacy of the draft EIS are identified by number, and BLM's responses to the comments follow each transcript.

Hearings were held in 1983 in the following towns, with dates and numbers of people testifying: Safford — July 18 — three; Lordsburg — July 19 — no one; Tucson — July 20 — 17; and Phoenix — July 21 - 11.

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT, SAFFORD DISTRICT

In the Matter of:)
)
DRAFT ENVIRONMENTAL IMPACT)
STATEMENT)
)
Proposed Wilderness Program) A PUBLIC HEARING
for the Safford District)
Wilderness EIS Area of Cochise,)
Gila, Graham and Greenlee)
Counties, Arizona and Hidalgo)
County, New Mexico.)
)

Old Armory Meeting Room
921 Thatcher Boulevard
Safford, Arizona

Monday, July 18, 1983

Pursuant to Notice and Publication, the above-entitled matter came on for Public Hearing at 7:00 o'clock, p.m.

BEFORE: LAWRENCE McHENRY, Attorney at Law
Office of the Solicitor
United States Department of the Interior
Phoenix, Arizona

APPEARANCES:

On Behalf of the Bureau of Land Management:

LESTER K. ROSENKRANCE
Distict Manager, Safford District, BLM

STEVE KNOX
Outdoor Recreation Planner
Safford District, BLM

APPEARANCES: (Continued)

On Behalf of the Bureau of Land Management:

PETE ZWANEVELD
Outdoor Recreation Planner,
Safford District, BLM

STAN WAGNER
Environmental Coordinator,
Arizona State Office, BLM

KEITH PEARSON
Sociologist, Arizona State
Office, BLM

JERRY COOLIDGE
Community Planner, Safford
District, BLM

KURT KOTTER
Gila Resource Area Manager,
Safford District, BLM

LYNN SALINE
San Simone Area Manager,
Safford District, BLM

ANDREA NYGVEN
Administrative Assistant,
Arizona State Office, BLM

I N D E X

SPEAKER	PAGE NO.
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P R O C E E D I N G S

PRESIDING OFFICIAL McHENRY: Ladies and gentlemen, this public hearing will now come to order.

I'm Lawrence McHenry. I'm an Attorney from the Field Solicitor's Office in Phoenix, Arizona. I've been appointed by the State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of the Interior concerning the wilderness study of the Safford District.

Most of you undoubtedly signed the attendance sheet as you came into this room. If you have not done so, I would like to ask you to sign in now.

If you plan to make a statement, be sure to check the appropriate space on the attendance sheet, so that we can add your name to the list of speakers.

The Official Reporter, seated at my right, Charles Emmons, will prepare a verbatim transcript of everything that is said in this hearing. If you wish to obtain a copy of the transcript, you should make your own arrangements with the Reporter.

This public hearing is being held to obtain information relating tc nine wilderness study areas which have been studied by the Bureau of Land Management. A Draft Environmental Impact Statement, an EIS, on this subject has been published and is available in this room. In a moment, I will call upon a BLM representative to explain briefly the findings of the wilderness study.

The purpose of this hearing centers on two issues. First, are these wilderness study areas suitable or not suitable for designation as wilderness? Your views and any information you can offer with respect to this question will be greatly appreciated and accepted.

Second, is the Draft Environmental Impact Statement adequate? Your comments and suggestions on this aspect of the study will also be appreciated.

In arranging for this public hearing, notices were sent out to United States Senators Dennis DeConcini and Barry Goldwater, and to Representatives John McKane, Jim McNulty, Edmond Rudd and Robert Stump, and to Governor Bruce Babbitt and to other elected officials. Replies which have been received from them will be read later and incorporated into the transcript of this hearing.

Notices also have been sent to federal, state and local government agencies and to organizations and individuals known to be interested in this wilderness study.

Now, for a few words about procedure: This hearing is not a debate, a trial, or a question-and-answer situation. It is an advisory hearing and all interested

persons may present statements, either written or oral or both, or other information pertinent to the wilderness study we are considering today.

There will be no cross-examinations from he audience, but if anyone fails to understand a statement of any speaker, you may direct a clarifying question to me and I will determine if it is pertinent. This may seem overly formal, but it is intended to give everyone a fair, reasonable opportunity to present his or her views.

When I finish my opening statement, I will call on the Bureau of Land Management representative to explain the Bureau's purpose and proposed action. That presentation should take about fifteen minutes. Then I will call upon any elected government official who wishes to make a statement. After that, we will proceed with other speakers.

Any written statement submitted here will be included in the full transcript and will be considered on the same basis as oral comments. You may also submit written comments until August 31st, 1983, and these also will be included in the hearing record and considered fully.

Written comments should be addressed to the District Manager, Bureau of Land Management, 425 East 4th Street, Safford, 85546.

The Federal Land Policy and Management Act of 1976,

FLPMA, directed the Bureau of Land Management to conduct a wilderness review of certain public lands. The wilderness study areas under consideration here today were identified by the BLM under criteria set forth in Section 2(c) of the Wilderness Act. The FLPMA directed the Bureau of Land Management to review such areas and prepare recommendations as to whether lands are suitable or not suitable for designation as wilderness. The law requires that a public hearing be held as part of this study process. This is what brings us here today.

The BLM has concluded the first part of its wilderness study and has published a Draft Environmental Impact Statement containing its preliminary findings. Now, it is the public's opportunity to comment on the matter.

After the hearing record closes on August 31st, 1983, there will be a thorough review of the Draft EIS. Your comments will be considered by the Bureau State Director in making his recommendations to the BLM Director in Washington who must make a recommendation to the Secretary of the Interior.

After due consideration, the Secretary will transmit his recommendations to the President. The President, in turn, will transmit his recommendations to the Congress. After appropriate consideration, which will include hearings,

the Congress will accept, reject or modify the President's proposal. Only Congress can designate an area as wilderness, and only Congress can release a BLM wilderness study area from its study status.

As you can see, the BLM preliminary proposal before you today will undergo comprehensive review. And this public hearing and your views are a very important part of that process.

Now, I will call upon Les RosenKrance, Safford District Manager of the Bureau of Land Management, to explain the preliminary findings of the wilderness study to you. But first, I would like to explain again that this is not an adversary proceeding. If you want to ask a question in order to clarify a certain point, please feel free to do so. Direct your question to me and I will determine whether it is pertinent.

At this time, I would like to introduce Mr. Les Rosenkrance.

LESTER K. ROSENKRANCE: First of all, I would like to welcome all of you here to our hearing tonight and appreciate the fact that you have come out to express your views and concerns about our wilderness study and our Environmental Impact Statement.

I will go over each one of the units -- each one of areas that we're talking about -- the wilderness study areas -- just real briefly to give you an idea of where they're at and so on. I suspect that everyone here probably knows.

At the same time -- first of all, though, I'd like to introduce some of my staff that are here:

Jerold Coolidge is our Planning Coordinator, Safford District.

Back here at the right is Kurt Kotter, Gila Resource Area Manager, and Lynn Saline, the San Simone Area Manager, and Steve Knox. He was our Team Leader on the Environmental Impact Statement, and Pete Zwaneveld assisted him throughout the study phase.

We haven't taken the study of the wilderness areas lightly. It's taken us now about three years. We've spent a lot of time and a lot of effort. We had to do a number of land-use planning amendments to bring it along this far before we could do the Environmental Impact Statement.

So the Environmental Impact Statement really is the end of about a four-year process that we've gone through. I'll go right on into the units very quickly.

Basically, in our proposed action for the wilderness study areas, there were nine units that we studied -- nine areas that had the characteristics that we felt needed study under 603 of the Federal Land Policy and Management Act, and portions of four of those wilderness study areas we're going to be recommending for wilderness designation. Now, this is in our Draft. And that's not final. Your comments and different things can still impact, or change that from whichever way we might go.

The four areas total about thirty-four thousand, eight hundred and eighty-one acres that we'll be recommending -- that we have recommended as proposed action in our EIS. The four units are Needle's Eye, and we'll eight thousand, nine hundred and seventy acres; and Black Rock, six thousand, five hundred and ninety acres; Fish Hooks, which is ten thousand, eighty-three acres; and Happy Camp Canyon, nine thousand, two hundred and thirty-eight acres.

We'll look at the map and I'll have Steve (Knox) assist me up here to point out each one of these units. Starting off with the map that's right here in front, is a map showing the Needle's Eye unit. The proposed action, again, recommends eight thousand, nine hundred and seventy acres as wilderness, and that's of a total of nine thousand, four hundred and eighty-five acres that we had studied in that area. Wilderness designation would protect and preserve wilderness values without significant impact -- significant adverse impact to other resource values and uses.

STEVE KNOX: Excuse me. The proposed action is outlined in blue on these maps.

MR. ROSENKRANCE: Okay, the next unit is the Black Rock unit. The proposed action recommends that we recommend six thousand, five hundred and ninety acres as suitable and one thousand, nine hundred and two acres as non-suitable.

The proposed action, together with the contiguous Forest Service RAR-2 area provides thirty-five thousand, six hundred and fifty-two acres of outstanding wilderness lands. Adverse impacts to other resource values and uses are not expected to be significant. However, there is a significant -- or an impact that we expect on some of the local landowners that are adjacent to the wilderness unit. We expect there will be some problems with some access and things like that, that have to be taken into account. Again, the blue line shows the area that we would recommending as suitable.

The third unit that we looked at was the Fish Hooks. The proposed action in the EIS recommends ten thousand, eighty-three acres as suitable for wilderness and four thousand, nine hundred and thirty acres as non-suitable. This designation would protect and preserve outstanding wilderness values, including many special features in that wilderness study area. Adverse impact to other resources and uses are not expected to be significant.

The next unit, Day Mine. The Day Mine unit is just adjacent to the Fish Hooks. The proposed action does not recommend that any of this wilderness study area be designated as wilderness. Though the wilderness study area contains the basic wilderness characteristics, it is not recommended for wilderness, due to low wilderness values and the presence of higher wilderness values in the nearby Fish Hooks wilderness study area.

The next unit was Turtle Mountain. The proposed action does not recommend any of the Turtle Mountain wilderness study area as suitable for wilderness. No lands are recommended for wilderness, due to low wilderness values, manageability problems resulting from access to state and private in-holdings and conflicts with livestock, minerals and energy resources.

Gila Box. The Gila Box proposed action does recommend any of the wilderness study area for wilderness status. No lands are recommended for designation because of conflicts between wilderness management and existing ORV use, potential mineral and energy uses. The WSA can be managed for its wilderness values without proposing opportunities for other uses.

Javelina Peak. The proposed action does not recommend any of this wilderness study area as suitable for wilderness designation. No wilderness designation is proposed for the WSA, due to low wilderness values and problems with management of the WSA as a wilderness, primarily, a land boundary situation.

The next unit is the Peloncillo Mountains. The proposed action does not recommend any of this wilderness study area for wilderness designation. No wilderness is recommended, due to manageability problems created by highly irregular boundaries. Potential for adverse impacts from compatible adjacent land uses, though not currently existing, cannot be ignored. Management of this area to preserve its wilderness values in the long-term cannot be guaranteed.

The next unit is Happy Camp Canyon. The proposed action recommends nine thousand, two hundred and thirty-eight acres as suitable for wilderness and seven thousand, five hundred and twenty-three acres that is not suitable. This proposal would protect the wilderness values of the Happy Camp Canyon watershed and eliminate the manageability problems associated with irregular boundaries and in-holdings.

Conflicts with the known mineralized area in the western portion of the wilderness study area would also be reduced.

That's the nine units that we've conducted our

studies on. All the areas will receive protection the same as if they were wilderness up until such time as Congress acts to either agree with us or disagree, whichever way they go. Once they recommend -- or once they decide and pass a law saying that they should be made wilderness, then they'll be made wilderness. But up until Congress has that opportunity to act, we will still treat them the same as if they were wilderness and protect their wilderness values along that line.

Once the WSAs have been designated as wilderness by Congress, we will manage them in accordance to whatever laws they pass along that line. They may pass specific laws for each unit, or they might pass -- just adjust them right into the wilderness system as it currently exists.

Use of motorized equipment and ORVs, normally, will not be allowed in these units. Mining and mineral leasing would be prohibited in designated wilderness, except on existing mining claims and leases.

While management of the four WSAs recommended for wilderness will emphasize management of wilderness values, current management of these four areas is not expected to change significantly. We still expect grazing to take place on those lands -- maintenance of grazing facilities and additional grazing facilities established in those areas.

Each one will have to be looked at on a case-by-case basis.

Okay, where do we go from here? I will receive your comments and input until August 31st, 1983. When all comments have been received, my staff will analyze those comments and make appropriate changes in the now existing Draft Environmental Impact Statement. I will then make my final recommendation for wilderness management in the Safford District to the State Director of Arizona.

We will prepare a preliminary Final Environmental Impact Statement and Wilderness Study Report in fiscal year 1984, which begins October 1st. Those dosuments will receive State Office and Washington Office and departmental review. Upon completion of the reviews, the Final Environmental Impact Statement and Wilderness Study Report will be printed and distributed to the public.

Recommendations on these nine wilderness study areas will be forwarded to the Secretary of the Interior in fiscal year 1985. The Secretary will make his recommendations to the President in about approximately sometime during fiscal year 1987. The President will make his recommendations to Congress and eventually, Congress will make the final decision.

Your input is really what I need to make my final recommendation to the State Director and to complete the Final Environmental Impact Statement. So with that

introduction or discussion of the units, I'll turn the meeting back to Mr. McHenry.

PRESIDING OFFICIAL: I've got only one speaker registered to speak tonight, make a statement. If anyone else wishes to make a statement after this first statement is made, please feel free to do so.

But first, I would like to ask if there are any elected officials who would like to make a statement here tonight?

(No response)

Okay, Mr. Newell Dryden?

NEWELL DRYDEN: Do you want me to introduce myself?

THE REPORTER: Yes.

NEWELL DRYDEN: Okay, my name is Newell Dryden. I live in Thatcher, Arizona. I am the son of Mr. and Mrs. V. N. Dryden, who have an allotment in the proposed Black Rock area.

We, the Dryden family, the Holiday family and the surrounding ranches are opposed to the Black Rock area as a wilderness area for the following reasons:

S-1

One, it's public use on private lands. If you'll look at the areas as designated on the Black Rock allotment, you'll find that access to the proposed wilderness area is through private land. On ranches that leads to the wilderness area.

Also, the same access road which the public would use, as I use and many of the people in this room use, including the government people, is the only access to another proposed wilderness area which has been under study for several years, and that's the U. S. Forest Service. It has not, to my knowledge, been designated as a wilderness area by the Forest Service at this time. It is still under study. They have made some adjustments to the things that can be done on the wilderness area in not only improvements for the rancher, but also the wildlife and also the people that want to see these lands by backpacking.

They, the Forest Service, and BLM on these areas have developed water, which, in my opinion, helps the rancher, the wildlife and the people that want to see the area. If they didn't do this, they would have no water to survive on when they got up there and found that they were lost.

There are numerous citings that will be presented in a letter to BLM at a later date, prior to -- what is it, August 28th? Is that correct? It will spell out these citings of what I call "public harassment". Those citings are trash, drinking, abuse of private land and government land by not only the public, but people who swear that this is what they want as a wilderness area. People who backpack in the area who make it hard on the people who live there, which is our front-door yard.

S-2

We have had numerous occasions where the people, or the public, both wilderness people, the hunters, the backpackers and the sight-seers has abused the public lands. They have also abused the private lands. And when I say "public lands", I would refer to as: One, use of off-road vehicles, not staying on designated trails or roadways. Two, woodcutting. Three -- I don't know how to term this, but I should say, grave robbery. And I mean grave robbery of people that lived here before you and I. And the common term is, I believe, "pot diggers" who have come on numerous occasions to this location and have dug without permission -- have vandalized these sites to where there are few of them now -- a few of them, now, are almost non-existent.

Now, BLM has put up some chainlink fences, but you know as well as I know that in an area that is as far away as this is, a chainlink fence means nothing.

S-3

The other thing we oppose -- the area as a wilderness area -- BLM has not established a buffer zone around the perimeter of the area for public use. They're asking the private landowner to, one, let the people park on their land. Let the people camp on their land. Let the people throw trash on their land. And let the people come in their front-door yard. And we do not feel that that's right.

The people in town -- in the city of Thatcher, or Safford -- wherever it might be, these people have protection. They have protection of the law. The people here must provide law protection for their rights.

On this given area, the Black Rock area allotment or designated wilderness, there is law, but there is no protection.

We, the Dryden family -- and I'm sure others have done the same -- have expressed our concern to both BLM and the Forest Service and the Game and Fish for problems that have arised there on this area that you're trying to turn into a wilderness area. And those problems include, again, poaching, off-road use of vehicles, and then the people that go in and dig up looking for artifacts.

S-4

The answer that was given to us by BLM and by Forest Service was, one, we do not have the personnel to enforce these laws and regulations. I'm saying now that if BLM and Forest Service does not have the personnel to enforce these laws and regulations now, how do they expect to do it later, when that area is turned into a wilderness area? Who is going to stop the off-roaders? Who is going to stop the trash throwing? And who is going to stop the pilfering of our heritage that was once here that we should respect and leave alone?

I see no way, in my past experiences, that the personnel of BLM can staff up enough to take care of these designated wilderness areas, because one, they do not have the budget. I have worked for BLM before. I know their problems with budgeting. They're the same as everybody else on their monthly budget. They have to budget for problems that they foresee in the future. And the way the economy is today, and the way I can forsee it later, I don't think they can do it. I don't think they have the manpower, and I don't think they have the funds.

Thank you.

PRESIDING OFFICIAL: Thank you very much, Mr. Dryden. Are there any others that would have any comments, that would like to put them on the record today?

S-5

DALE GATLIN: There is one other thing that Newell didn't bring up and that's the destruction of waters -- windmills and your tanks. I know of a rancher in this valley that's suffered these losses from time to time, windmills being shot up, tanks being shot up, cattle being shot around the waters. It happens every year. And it's just one more problem that you have with the public, and in this instance with Black Rock, it's all private ground that has to be crossed for access.

PRESIDING OFFICIAL: Sir, could I have your name, please?

MR. GATLIN: Dale Gatlin.

PRESIDING OFFICIAL: Would you give us the apelling of your last name.

MR. GATLIN: G-a-t-l-i-n. There's already been problems of losing cattle right on the road as it stands, now. Right next to your door. I've been shot at. And it's no fun.

JODINE GLOVER: Can I talk now?

PRESIDING OFFICIAL: Dale, are you through?

MR. GATLIN: Yes, I am through.

PRESIDING OFFICIAL: And your name, please?

MS. GLOVER: Yes, Jody Glover.

PRESIDING OFFICIAL: Please come forward to the podium. What was your name, again?

MS. GLOVER: Jodine Glover. I would like, first, to second everything that Newell Dryden spoke on. It was -- every word was true. And I am a neighbor of Newell's and have been -- Newell's mother and I grew up together in this locality that we're speaking of, the Black Rock area.

And I have lived, as I said, about -- I've been in the area all -- practically all of my life. And I can see no advantage of taking Black Rock into a wilderness area.

Living there, as I wrote in my letter to be presented to you folks, I can see no destruction of the wildlife. In fact, if it hadn't have been for the ranchers, we wouldn't have the wildlife that we do. We have maintained water for them. Lots of times, we have water. Lots of times, we don't. It's according to what the Good Man wants to send us. And when our waterholes dry up, we haul water to our different -- we install tanks and haul water. And the wildlife benefit from it.

And we have had considerable destruction, and as we feel, the BLM does not have the authority to go out and patrol our lands. And so if we do, then we are harassed, just as my son-in-law said, he and I was rounding up cattle this spring and we had some picnicers camped within, I would say, twenty feet of our corral where we was trying to corral our cattle. And I walked over and talked to them and I could see my son-in-law up on the hill coming with some cattle. So I left to assist him. And all of a sudden, our picnicers decided they wanted to do a little target practicing. And I couldn't get back. I had went down the creek to turn the cattle up the creek and I could hear them shooting. And I tried to motion to Dale to come on, but he didn't see me. He was watching the cattle and all of a sudden, a bullet just zoomed right by his head.

He came off the side of this mountain and asked them what they was doing and they said they was target practicing. He said, you almost hit me. They said, well, we didn't see you. He said, that wouldn't have done me no good if the bullet would have hit me.

And about a year ago, we was setting on our front porch, my husband and I, and some people from Sierra Vista was out hunting -- and it's on private ground -- and all of a sudden, the little BBs from the shotgun shell went zooming by our heads. And my husband hollered and went down and confronted the people and they said, well, we had no idea that anybody lived out here.

And then, this -- during hunting season, it was -- and it's a good thing I always sleep on the front porch in the summertime, but in the wintertime, I don't -- and by my bed, I can take you out, someone shot a rifle. We had come to town and went home that night, and right through our front area, my front window on the porch is a bullet hole about that big. They had shot a deer up on our land.

And as I said -- and as my son-in-law -- when we confront these people about these -- what we feel, they're on our own rights -- I mean, coming on our own private land and doing these things -- then, we are punished in another way. They either come back -- not all people. A lot of

people, as I wrote in my letter to you, you meet all kinds of people in life. And there's some people that are very considerate and will apologize -- well, we didn't know that this was that way.

We've had some hunters out from down in the Phoenix area that have been very nice people. And they come back every year. And we've had some that have been pills. That's putting it real, real mildly, what I'd like to say. And if you confront them, they come back -- in fact, just as my son-in-law was talking about -- about this -- I had my grandson with me and we had some campers come. They was two carloads of them camped right down below our corrals. Pot smokers is what I call them, sir. And you could smell the pot. It was -- you just reeled. And I went down and told them that that wasn't a public camping ground. That was private ground.

So they left. They gathered all their dogs and -- they are erp people. I don't know how you -- what you refer to them. I call them "erp people" -- or undesirables, however you want to label them. And we had to be away. We came to town and was in town for about a week and went back and along the creek there, to this very day, we haven't even found a hair of two calves that was about, oh, four hundred and fifty-pound yearlings that was -- that had run along the creek that just disappeared and I'm sure that somebody enjoyed some meat on the Glovers, because we got to inquiring around and we found that even in the town of Fort Thomas, this same people that I'm talking about had stole -- stolen a calf of some friends of ours that came out to dry wall our house.

S-6

And another thing that we would like to know -- Newell touched on it -- about the rockhounds, the horseback riders and the hikers and the photographers, the sightseers and the "no-goods" I call them -- where are they going to park? Where are they going to be camping?

As you know, this is practically all private ground from the time you leave -- just ninety-five percent of it is private ground. And before you get to the private ground, you are crossing an Indian reservation. The Indian people have been cooperative to this point with us, and have let us cross their lands. But previous to that, there was rumors, and we heard them, that they was going to close the lands, to try to force us to sell. They was going to close the lands to the White Man and all this stuff.

We are afraid -- we ranchers -- that if there is an influx of campers, hikers, horseback riders and all, and they choose to stop on the Indian reservation and create problems, that we will be the people that will suffer, if the

road is closed -- not the backpackers and the photographers. And it is a possibility that it can come to that.

And as Newell said, we have had wildlife pached. We've had livestock killed. We've had our stock tanks blown up. And we have even had our house previous to this one many times broke in. And during javelina season, two years ago, we had our house burnt to the ground.

So you see, I'm pretty -- I'm -- that is why I am so strong against this wilderness area. We feel that that the BLM, the Forest, have done a terrific job managing this forest and this BLM grazing land all through these years that they have done. We have to work with them on anything that's built, or any stock tanks that's made, any springs that are developed, any corrals that's on BLM land, you have to work with these two federal government agencies. They have worked with us very well.

Why change it? We have enough government in our hair not without getting more government involved. Let's let the land be for the people, not for the govenement. And thank you very much, sir.

PRESIDING OFFICIAL: Are there any others that wish to make any kind of statement or comment tonight?

NEWELL DRYDEN: May I reopen my statement, please?

PRESIDING OFFICIAL: Yes, you may.

MR. DRYDEN: This is Newell Dryden, again. And I would like to reopen the beginning of my original statement, referring to access to the public lands.

What I'm referring to is an aisle of access by the BIA, the Bureau of Indian Affairs. To my knowledge, at this date -- and I think BLM would have to check county records to see if this road leading to the Black Rock wilderness -- or proposed area -- has been designated as a public road.

Now, we were under the understanding after meeting with county officials that there was some question as to the legality of the public road. They would not cross the reservation premises without permission from BIA.

Clo Dryden and Curtis Dryden met with a couple of the counsel members from BIA. They gave them verbal permission for one passage only by the county grader to maintain that road for a one-time, one-situation, when the road was impassible.

They have not -- the county has, to my knowledge, written to BIA in writing and expressed opinions of wanting to maintain this road. BIA, again, has only given verbal approval for maintenance of the road by the county.

Two weeks ago, I was called by a young lady out of Tucson. She was with one of the wildlife clubs. She asked me if it would be all right to go to the Black Rock allotment

-- or Black Rock wilderness area -- proposed area and take a survey for her club so that they could give their opinion in Tucson, which I assume was last week, of what they felt should be done. She asked me a few questions and I gave her my opinion.

And I expressly -- I expressed my concern for denial of access by BIA to not only private lands, but public lands. She made the comment, she says, well, as I'm looking at the map, it seems possible to make another road to access your lands. I asked the lady if she had been there before, and she said, no, I have not. I said, well, when you get there, you will see that the terrain is such that it would be almost impossible, costwise, to put a road in, in that area.

S-7

So, again, as I reopen my statement, the main point that I wanted to bring out for BLM to please check the legality of this road actually being a public road and also to check prior approval with BIA to see if this road is going to stay open, because if it isn't, it denies access not only for us, but you and the government, except by other means. And I can't afford a helicopter. The government is the only one that I know can afford that for fighting fires.

Thank you.

PRESIDING OFFICIAL: Thank you again, Mr. Dryden.

Again, I'll ask the audience, is there anyone else who would like to make a statement?

(No response)

The District Manager, Mr. Roaenkrance, has suggested that maybe after closing the hearing, that he may field a few questions from the audience. This is a little out of the way for us tonight, but since we do have this time, I'd like to thank you for your participation and for your showing up tonight and your interest in the Bureau of Land Management's wilderness studies.

I will now close this hearing. If you do have any questions that you would want to ask any of the BLM employees here, feel free to ask. Thank you.

(Whereupon, the hearing in the above-entitled matter was closed.)

(A document submitted by Mrs. Jodine Glover was marked for identification as Glover Exhibit A, and is included with the original of this transcript.)

CERTIFICATE

THIS IS TO CERTIFY THAT the foregoing proceeding in the matter of the Draft Environmental Statement, Safford District Proposed Wilderness Area Program was held as herein appears, and;

THAT the foregoing pages 1 through 29 are a true and correct transcript of tape recordings taken and monitored by myself at the time and place hereinbefore written.

Charles Emmons
CHARLES EMMONS & ASSOCIATES
3920 E. Indian School Road
Phoenix, Arizona 85018
GSA Contract Reporters

P. O. Box 1073
Safford, Arizona 85546

Glover Exh A

July 18, 1983

TO WHOM IT MAY CONCERN:

We do not see by putting Black Rock into a wilderness area that anything is being accomplished; only creating more government jobs and paper work for it's employees.

My father, Oscar Blair, acquired the ranch on January 6, 1917, and I was born there. My husband and I helped manage the ranch the past twenty-five years, owning it the last ten years. During my lifetime spent in the Black Rock area, I certainly can see no changes in the scenic, wildlife, human imprints and activities, vegetation, or wilderness destruction. The lands look today, the same as they did to me of my first recollection, approximately sixty years ago. Some years the vegetation is much better than other years as the water is more plentiful, but that depends on "The Man" above.

We feel we have too much government involvement now. The country is no longer for the people, by the people, etc., but for the government, by the government, with the people being victims of our bureaucracy.

If the rancher did not maintain the windmills, develop existing springs by distributing water to strategic places, haul water when the springs dry up, there would by a drastic reduction in wildlife. So far, I have never heard of the environmentalists, hunters, or Game Department checking to see if game water holes have dried up.

S-8

If you want to destroy the area in a hurry, just declare it a "Wilderness Area". You will have an influx of people coming here to see what they have missed through the years. If you could control who came, it would be fine, but you get all kinds. There are some who are considerate--who leave the area as they find it, with consideration for others. Then there are some who just plain don't give a d---. They destroy, poach the wildlife, kill the livestock, blow holes in your stock tanks and windmills, and steal what they can. Who is going to ride herd on these hikers, backpackers, horseback riders, hunters, rock hounds, birdwatchers, photographers, sightseers, and throw in all the no-goods that are just out looking for something to destroy?

There was no mention of where the facilities would be located for the above mentioned to camp, park, etc. Practically all the accessible road is a cross patented ground. If they start parking and camping on reservation ground, it could possibly cause a closure of the road across the reservation which would cause an extreme hardship on the ranchers. So far the tribal council has been very cooperative with the ranchers, but with a change of status of the land, they could also change their views.

We have invested a considerable amount of money and years of hard labor to improve the entire allotment, so in our latter years (which is now) we could sustain ourselves without anxiety of how we would pay the bills, buy groceries, pay doctor bills, etc. and now we are slapped with this prospect. We feel

TO WHOM IT MAY CONCERN
Page 2
July 18, 1983

with the area being declared a "Wilderness Area" our income will decrease and we will suffer a substantial decrease in valuation of our property. In fact, we feel we do not know where we stand concerning our grazing permits in conjunction with the "Wilderness Area." We feel they have guaranteed us no security in regards to our grazing allotments. At our ages it would be rather hard to start over again and that is what we feel you are trying to eventually force us to do.

So in closing we say, leave the land as it is; as it is being well managed now by the BLM and forest service with due consideration for everyone.

Respectfully,

Jo Dean Glover
JODEAN B. GLOVER

Lloyd L. Glover
LLOYD L. GLOVER

SAFFORD PUBLIC HEARING RESPONSES

S-1 See Response 87-2.

S-2 See Response 16-1.

S-3 See Response 16-1.

S-4 See Response 136-2.

S-5 See Response 16-1.

S-6 See Responses 16-1 and 87-2.

S-7 The BLM requested the Department of the Interior Field Solicitor to determine whether the San Carlos Indian Tribe can legally close the Black Rock and Goodwin Wash roads across the Reservation. It is the Solicitor's opinion, dated February 27, 1984, that the Black Rock and Goodwin Wash roads are Bureau of Indian Affairs (BIA) roads and have been periodically bladed by BIA with federal funds. As such the Tribe cannot close the roads. Only the Indian Commissioner can authorize closure of the roads for (1) public safety, (2) fire prevention or suppression, (3) fish or game protection or (4) to prevent damages to an unstable road bed. Section 170.8(a), Code of Federal Regulations, Title 25, states that free public use is required on roads eligible for construction and maintenance with federal funds.

S-8 See Responses 16-1, 16-2, and 87-2.

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT, SAFFORD DISTRICT

In the Matter of:)
)
DRAFT ENVIRONMENTAL IMPACT)
STATEMENT)
)
Proposed Wilderness Program)
for the Safford District)
Wilderness EIS Area of Cochise,)
Gila, Graham and Greenlee)
Counties, Arizona and Hidalgo)
County, New Mexico.)
)

A PUBLIC HEARING

Lordsburg Cultural Center
West Meeting Room
313 East Fourth Street
Lordsburg, New Mexico

Tuesday, July 19, 1983

Pursuant to Notice and Publication, the above-entitled matter came on for Public Hearing at 7:00 o'clock, p.m.

BEFORE: LAWRENCE McHENRY, Attorney at Law
Office of the Solicitor
United States Department of the Interior
Phoenix, Arizona

APPEARANCES:

On Behalf of the Bureau of Land Management:

LESTER K. ROSENKRANCE
District Manager, Safford District, BLM

STEVE KNOX
Outdoor Recreation Planner, Safford District, BLM

APPEARANCES:

On Behalf of the Bureau of Land Management:

PETE ZWANEVELD
Outdoor Recreation Planner, Safford District, BLM

STAN WAGNER
Environmental Coordinator, Arizona State Office, BLM

KEITH PEARSON
Sociologist, Arizona State Office, BLM

JERRY COOLIDGE
Community Planner, Safford District, BLM

KURT KOTTER
Gila Resource Area Manager, Safford District, BLM

LYNN SALINE
San Simone Area Manager, Safford District, BLM

ANDREA NYGVEN
Administrative Assistant, Arizona State Office, BLM

P R O C E E D I N G S

PRESIDING OFFICIAL LAWRENCE McHENRY: It's 7:30, Tuesday, July 19th, 1983. The Public Hearing for the Safford Wilderness Study is now open, and also, now closed, because of the lack of any audience, whatsoever.

That's it.

(Whereupon, the hearing in the above-entitled matter was closed.)

C E R T I F I C A T E

THIS IS TO CERTIFY THAT the hereinbefore captioned matter came on as indicated above and that all preparations to take the record had been made, but no persons representing the general public appeared at the hearing site.

Charles Emmons
CHARLES EMMONS & ASSOCIATES
3920 East Indian School Road
Phoenix, Arizona
GSA Contract Reporters

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PUBLIC HEARING
DRAFT WILDERNESS ENVIRONMENTAL IMPACT STATEMENT

COUNTY BOARD OF SUPERVISORS HEARING ROOM
111 West Congress, Tucson, Arizona
7:00 p.m., July 20, 1983

BEFORE: LAWRENCE McHENRY, Hearing Officer

BUREAU OF LAND MANAGEMENT REPRESENTATIVES:

Les Rosenkrance
Lynn Saline
Kurt Kotter
Steve Knox
Pete Zwaneveld
Jerold Coolidge
Stan Wagner

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PROCEEDINGS

HEARING OFFICER McHENRY: Ladies and gentlemen, this public hearing will now come to order.

First let me introduce myself: I'm Lawrence McHenry and I am an attorney advisor for the Field Solicitor, Department of the Interior, Phoenix, Arizona. I have been appointed by the State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of the Interior, concerning wilderness study of the Safford District.

Most of you undoubtedly signed the attendance sheet as you came in the room. If you have not done so, I would like to ask you to sign in now. If you plan to make a statement, be sure to check the appropriate space on the attendance sheet so we can add your name to the list of speakers.

The official reporter seated in front of me, Lorraine Qualls, will prepare a verbatim transcript of everything that is said in this hearing. If you wish to obtain a copy of that transcript, you should make your own arrangements with the reporter.

This public hearing is being held to obtain information relating to nine Wilderness Study Areas which have been studied by the Bureau of Land Management. A

Draft Environmental Impact Statement, EIS, on this subject, has been published and is available in this room. In a moment I will call on the Department's representative to explain briefly the findings of the Wilderness Study.

The purpose of this hearing centers on two issues: first, are these Wilderness Study Areas suitable or not suitable for designation as wilderness? Your views and any information you can offer with respect to this question will be greatly appreciated.

Second, is the Draft Environmental Impact Statement adequate? Your comments and discussions on this aspect of the study will also be appreciated.

In arranging for this public hearing, notices were sent to the United States Senators Dennis DeConcini and Barry Goldwater, and to Representatives John McCain, Jim McNulty, Eldon Rudd, and Robert Stump, and to Governor Bruce Babbitt, and other elected officials. Replies which have been received from them will be read later and incorporated into the transcript of this hearing. Notices also have been sent to federal, state, and local government agencies and to organizations and individuals known to be interested in this Wilderness Study.

Now, for a few words about procedure, this hearing is not a debate, a trial, or a question and answer situation. It is an advisory hearing and all interested persons may present statements, either written or oral, or both, or other information pertinent to the Wilderness Study we are considering today. There will be no cross-examination from the audience, but if anyone failed to understand the statement of any speaker, you may direct a clarifying question to me and I will determine whether it is pertinent. This may seem overly formal, but it is intended to give everyone a fair and reasonable opportunity to present his or her views.

When I have finished my opening statement, I will call upon the Bureau of Land Management representative to explain the BLM's purpose or proposed action. That presentation should take about fifteen minutes. Then I will call upon any elected government official or officials present who wish to make a statement. After that we will proceed with other speakers.

In view of the number of people who wish to speak and the limited time available, each speaker will be limited to five minutes. If you cannot express all your comments in that length of time, you may submit further comments in writing. Any written statements submitted here will be included in full in the transcript and will be considered on the same basis as the oral comments. You may also submit written comments until August 31, 1983, and these also will be included in the hearing record and

considered fully. The written comments should be addressed to the District Manager, Bureau of Land Management, 425 East 4th Street, Safford, Arizona, 85546. Again, that address is 425 East 4th Street, Safford, Arizona, 85546.

The Federal Land Policy and Management Act of 1976, FLPMA, directed the Bureau of Land Management to conduct a wilderness review of certain public lands. The Wilderness Study Areas under consideration here today were identified by the BLM under criteria set forth in Section 2B of the Wilderness Act. The FLPMA directed the Bureau of Land Management to review such areas and prepare recommendations as to whether the lands are suitable or not suitable for designation as wilderness.

The law requires that a public hearing be held as part of the study process. That is what brings us here today. The BLM has completed the first part of its Wilderness Study and has published a Draft Environmental Impact Statement containing its primary findings, or preliminary findings. Now it is the public's opportunity to comment on the matter. After the hearing record closes on August 31, 1983, there will be a thorough review of the Draft EIS. Your comments will be considered by the BLM State Director in making his recommendations to the BLM Director in Washington, who must make a recommendation to the Secretary of the Interior.

After due consideration the Secretary will submit his recommendations to the President. The President, in turn, will transmit his recommendations to Congress. After appropriate consideration, which will include hearings, the Congress will accept, reject, or modify the President's proposals. Only Congress can designate an area as wilderness and only Congress can release the BLM Wilderness Study Areas from its study status.

As you can see, the BLM Preliminary Proposal before you today will undergo comprehensive review. This public hearing and your views are a very important part of that process.

Now we will call upon Les Rosenkrance, Safford District Manager of the Bureau of Land Management, to explain the preliminary findings of the Wilderness Study to you. But first I would like to explain to you again that this is not an adversary proceeding. If you want to ask a question in order to clarify a certain point, please feel free to do so. Direct your question to me and I will determine whether it is pertinent.

I now give you Les Rosenkrance.

MR. ROSENKRANCE: First of all I would like to welcome all of you here tonight. We appreciate you coming out and meeting with us tonight and giving us your viewpoints on our Wilderness Study Areas. We haven't taken

this task lightly. We've been about four years studying the sites and looking at them all; looking at them during all seasons of the year and looking at the different uses and potential uses of what the various resources are that were involved, what resources may be threatened or not threatened, or whatever, and tried to come up with what we believe is a good, valid approach to the wilderness issues in the Safford District.

One of the things I would like to do right now is introduce some of the people that are here that are with my staff, and as soon as the hearing is completed, if any of you have any questions about any project that was done, we will be glad to stay around and talk to you about individual units or talk to you about anything that you have in mind, whether it's in regard to wilderness or not. We'll spend some time here until we all wear out, or whatever.

First of all I have Kurt Kotter. He is the Gila Resources Area Manager. Next to him is Lynn Saline. He is the San Simon Resources Area Manager. Right behind Lynn is Stan Wagner from our Arizona State Office out of Phoenix. Then over on this side here is Steve Knox. He was the program leader or the team leader that conducted the studies and put the Environmental Impact Statement together. Also, I have Pete Zwaneveld, one of the team members back in the back of the room. Jerold Coolidge is our Planning and Environmental Coordinator. I lost Jerold. Oh, he's out here at the desk. So feel free to grab any one of those people at anytime and ask them any question you may have about what we've done.

I'll just briefly go through each of the units talking about what the acreages are and what we've come to in our decision at this point, or our recommendation.

First of all, we inventoried all the lands to decide which ones met the wilderness criteria that was set up for us to look at. We studied the land-use planning system, and then also through the Environmental Impact Statement Process, in which we're in the first stage of that one. We will report our suitability recommendations to Congress -- or not to Congress, excuse me, to the Secretary of Interior sometime next fiscal year, and in fiscal year '85, which begins October 1. The units that we've got, there is a total of 131,820 acres that we have studied in the nine WSAs.

The first one of those is the Needle's Eye. The Needle's Eye was 9,485 acres is what we've studied. It's in the Mescal Mountains, twenty miles south of Globe. This map depicts the area. The blue line is the area that we have determined is suitable for wilderness. The remain- boundaries outside are the areas that were nonsuitable, that

we found nonsuitable. So out of the 9,485 acres, we are proposing that 8,970 acres are suitable and 515 acres are nonsuitable. The wilderness designation would protect and preserve wilderness values without significant adverse impact to other resource values and uses in that unit.

The next unit is one we called Black Rock. Black Rock consists of 8,492 acres. It is located in the Santa Teresa Mountains twenty-five miles west of Safford. It's adjacent to National Forest lands. The Proposed Action recommends that 6,590 acres is suitable as wilderness and 1,902 acres are nonsuitable. The Proposed Action, together with the contiguous Forest Service RARE II area, provides 35,652 acres of outstanding wilderness lands. Adverse impacts to other resource values and uses are not expected to be significant.

One of the problem areas with this one still is some access problems over private lands in order to get to the normal jumping off point to visit the area.

The next unit is the Fishhooks. It consists of 15,013 acres. It is located in the Gila Mountains. It is twenty-five to thirty miles northwest of Safford. The Proposed Action recommends 10,083 acres as wilderness and 4,930 acres as nonsuitable. The designation would protect and preserve outstanding wilderness values including many special features in the WSA. Adverse impacts to other

resource values and uses are not expected to be significant. One of the significant features in this particular unit is a unique vegetative type that is located there.

The next unit is the Day Mine. The Day Mine is adjacent to the Fishhooks unit. It consisted of 16,629 acres. The Proposed Action does not recommend any of the WSA as wilderness. Though the WSA contains the basic wilderness characteristics, it is not recommended for wilderness due to lower wilderness values and the presence of similar but higher wilderness values in the nearby Fishhooks WSA.

The next unit was Turtle Mountain. The Turtle Mountain unit consisted of 17,422 acres in the Gila Mountains, twenty miles northeast of Safford. The Proposed Action does not recommend any of the Turtle Mountain WSA for wilderness designation due to low wilderness value, manageability problems with inholdings needing access to state and private lands that are located within the boundaries of the WSA. Also, conflicts with livestock and minerals and energy resources.

The next unit was the Gila Box. Gila Box consists of 17,831 acres. It's located along the Gila and San Francisco Rivers northeast of Safford. The Proposed Action does not recommend any of the Gila Box as suitable for wilderness status. No lands are recommended for

designation because of conflicts between wilderness management and an existing ORV use and potential mineral and energy uses. The WSA can be managed for its wilderness values without foreclosing opportunity for other uses.

The next unit is Javelina Peak. This unit consisted of 17,870 acres. It's located at the south end of the Whitlock Mountains. It's twenty miles southeast of Safford. The Proposed Action does not recommend any of the WSA for wilderness designation. No wilderness suitability is proposed for this WSA due to lower wilderness values and problems with management of the WSA wilderness. Again, it has some boundary problems with private lands encroaching on the area.

The next unit is Peloncillo Mountains. Peloncillo Mountains consists of 12,317 acres. It's located thirty miles southeast of Safford and approximately five to ten miles north of Interstate-10. The Proposed Action does not recommend any of this WSA for wilderness designation. No wilderness is recommended due to manageability problems created by highly irregular boundaries. The potential for adverse impacts from incompatible adjacent land uses, though not currently existing, cannot be ignored. The management of this area to preserve its wilderness values in the long-term cannot be guaranteed. Irregular land pattern, as you see on that particular map, just does not lend itself to protection under the Wilderness Act. Some of the higher resource values that are there are either private lands or something that could be developed to where it would impact the federal lands to where we just can't guarantee that it would remain wilderness.

The last of the nine units is the Happy Camp Canyon. This unit consists of 16,761 acres. It's located in the Dos Cabezas Mountains fifteen miles east of Willcox. The Proposed Action recommends 9,238 acres as wilderness and 7,523 acres as nonsuitable. This proposal would protect the wilderness values of the Happy Camp Canyon watershed and eliminate manageability problems associated with irregular boundaries and inholdings. Conflicts with the known mineralized area in the western portion of the WSA would also be reduced with our proposal.

Management of Wilderness Study Areas. Interim management: The WSAs will be managed to preserve their wilderness character until Congress acts. WSAs not designated wilderness will be managed for other multiple uses, and once Congress acts and designates whichever areas they so choose to designate as wilderness, they will all be -- those areas will be managed then to protect their wilderness values. Other compatible land uses such as livestock grazing, hunting, and camping will continue in designated wilderness. Use of motorized equipment and ORVs normally

will not be allowed. Mining and mineral leases would be prohibited in designated wilderness except on existing mining claims and leases.

While management of the four Wilderness Study Areas recommended for wilderness will emphasize the management of wilderness values, current management of these four areas is not expected to change significantly from what it is today.

So next I would like to just talk about what our schedule is, what the procedure is from here. First of all, I will be receiving comments from the public until August 31, 1983. When we have received all the comments, we will do an analysis of those comments and then we'll make appropriate changes to the Draft Environmental Impact Statement. Then I'll make my final recommendation to the State Director as to where I think we ought to go. We will then prepare a preliminary final Environmental Impact Statement and Wilderness Study Report in fiscal year 1984. Those documents will receive State Office, Washington Office, and Departmental review. Upon completion of the reviews, the final Environmental Impact Statement and Wilderness Study Report will be printed and distributed to the public. The recommendations on these nine WSAs will be forwarded to the Secretary of the Interior in fiscal year 1985.

The Secretary will make his recommendations to the President about 1987 sometime. Again, this is just kind of a guess. We don't really know when he might do it. The President will then make his recommendation to Congress and eventually Congress will make their decision. Your input to us at this point is very critical as -- well, it's important for us to decide whether our Environmental Impact Statement at this point is adequate or whether we've made some mistakes in determining the suitability or nonsuitability of the areas.

So I would really encourage you to make statements, not only here, but also talk to some of our people here after this meeting and let us know what you are thinking.

UNKNOWN SPEAKER: Would you deem it pertinent to have the speaker expand on his statement that in the wilderness areas, in the areas that are designated as wilderness, motorized vehicles and off-road vehicles will not normally be permitted. I don't understand what --

HEARING OFFICER McHENRY: Okay. As a point of clarification, I think you do have a pertinent question that could be answered. Mr. Rosenkrance?

MR. ROSENKRANCE: As you are aware of, some of the grazing improvements that are currently there are to be protected and maintained. There may be a stock tank

that would need some maintenance. With mutual agreement between us and the livestock operator, we could allow a piece of equipment to be taken in on a specific route to maintain that particular facility and leave again by that same route. It would be that kind of a thing.

Also, where there are existing mining claims, there may be some way that they could use certain types of motorized equipment on that mining claim where it's already existing today. Okay.

HEARING OFFICER McHENRY: Thank you very much. I have a list of speakers. We've got approximately fourteen. Mr. Paul Hirt wishes to speak longer than five minutes, so I'm going to put you at the end of the list so I can give you adequate time to speak or to make your presentation.

The first speaker --

MR. HIRT: May I ask a question? It would be pertinent to some of the other testimony for me to speak first.

HEARING OFFICER McHENRY: Well, I'm going to have to limit your time to five minutes and if you have more comments to make, then I'll pick up the rest of it at the end, or if you can get the second person to give up her time and let her go second, or last. It doesn't matter to me. Or anybody else that is --

MR. MAKEPEACE: My name is David Makepeace.

I think I'm at the end of the list already and I'll be glad to waive my time for Mr. Hirt.

HEARING OFFICER McHENRY: Mr. Hirt, you have ten minutes. Would you please state your full name and give us your address.

MR. HIRT: My name is Paul Hirt and I live at 1038 North Perry, Tucson, 85705. I am representing the Rincon group of the Sierra Club. I would like to thank you for allowing me the ten minutes.

First of all, the preparers have done an excellent job with the Draft EIS. It is easy to read and structurally very clear and concise. I come from a critical point of view here, however, because I see a basic flaw pervading the document: It does not promote wilderness. Your recommendations are a disappointing, bare bones version of what are excellent qualifying roadless areas in the Safford District. I'm here to urge you to designate all or portions of all nine WSAs as wilderness.

Before I get into that, however, I want to mention two brief items that I would like you to consider as you work up the final EIS.

T-1

On page 2, Section No. 11, you state that BLM will not recommend reclassification of air quality standards to Class 1 should an area be recommended for wilderness. This is contrary to Congressional intent. National parks

and wilderness areas are mandated the strictest Class 1 clean air protection. Why aren't you upholding this? We intend to lobby aggressively for Class 1 standards.

T-2

Also on page 2 under the summary of environmental consequences, your team of resource specialists determined that, quote, no alternative would measurably impact topography, water, climate, air quality, vegetation, fire management, or noise, end quote. To the contrary, increased grazing, mining, geothermal development and off-road vehicle use would measurably impact vegetation, water quality and quantity, air quality and noise. That is, unless no significant increase in the above uses are expected. In that case there would be little conflict with wilderness designation. All nine of these WSAs qualify for wilderness by definition. Unless there is some overriding conflict with another resource use, the area should be managed as wilderness.

T-3

Let's talk about other resource conflicts. Also on page 2 of the DEIS, you claim that a significant adverse impact on mineral exploration would result from any wilderness alternative. Why is this? Because no new claim-staking, prospecting, or exploration can take place in designated wilderness. However, due to a compromise pushed by mining interests into the 1964 Wilderness Act, any valid claim established prior to designation of a

wilderness will remain valid and developable forever, so long as the claimant keeps up his normal assessment work.

All of the areas in the DEIS with known mineralization, and many with only speculative potential, are covered by valid claims. At first, then, it might seem that wilderness would significantly impact exploration and development. But is this really the case? On page 66 of the DEIS, you state, quote, the total impact of a wilderness designation on mineral and energy exploration and development will never be known, close quote, and, quote, an area's mineral resource potential can never be fully evaluated, close quote. I have been working on this with the Forest Service wilderness program, too, and the problem really lies with the word "potential." No one can define it. It is a judgment, guesswork based on what is known. The very same set of facts can induce widely disparate assessments of potential.

T-4

In your section on Minerals and Energy you had the Arizona Bureau of Geology and Mineral Technology assess the complete history of mining activity and geology within each WSA, as well as about a 20-mile radius surrounding it. The integrity of the factual information is impeccable; however, inferring the mineral potential of an area based on what is found within a 20-mile radius is, at the very least, suspect. It is misleading to flood the reader with mineral production figures from areas which are purportedly,

quote, near, unquote, the WSA, when, in fact, these mining activities occur up to ten or twenty miles away in completely different geologic settings.

There were or are mining activities within a 20-mile radius of just about everything in southeast Arizona, including this hearing room. I don't see anyone trying to slow urban growth because there might be mineral potential here. Some areas are simply good bets for economic mineral production and should be allocated to those uses, while other areas are not and should be reserved for other uses like wilderness.

Now, when potential is unknown, undefinable and changes continually with technology and economics, as you have stated, then you simply find some better method of assessing the resource value. You look at it as a prudent businessman or investor would; that is, you assess historic production in the area and known geologic information. Your litany of this type of information is very revealing:

Page 36, the Needle's Eye: Quote, no known economic mineral deposits occur within, end quote.

Page 37, Black Rock: Quote, the only known mineralization within is fluorspar . . . which produced 1,200 tons of ore in the 1950's . . . potential for other mineral production within the WSA appears to be low, unquote. The fluorspar mine is outside the WSA, by the way.

Page 38, Fishhooks and Day Mine: Quote, no known economic mineral deposits occur within either WSA and the potential for production appears low, unquote.

Page 38, Gila Box and Turtle Mountain: Quote, the only reported economic mineral in these WSA's is manganese in the eastern portion of Gila Box . . . the volcanic rocks underlying the WSAs have yielded no mineral production in the past, unquote.

Page 38, Javelina Peak: Quote, no known economic minerals occur in this WSA, unquote.

Page 39, Peloncillo Mountains: Quote, no known economic minerals occur within this WSA . . . the possibilities for economic mineralization in this district are not favorable, unquote.

Page 39, and finally the one exception, Happy Camp Canyon: Quote, the number of mineral occurrences in and around the WSA reveals a strong potential for mineral exploration and development, unquote.

Yet Happy Camp is one of the units you recommend for wilderness. Of course, you did what was reasonable in the situation; you identified the areas with past production, present interest and obvious geologic favorability, and excluded them so that the bulk of the area has a generally low mineral production value. Obviously, the wilderness resource of the recommended portion of Happy Camp Canyon was

more valuable than the mineral resource. Likewise, the minerals in the more actively explored area were of greater value than the wilderness resource. This makes sense.

All this talk about wilderness having a significant adverse impact on mineral exploration and development, though, is simply hogwash. These areas are poor candidates for that, as your own DEIS points out, despite the copious descriptions of mineralization in surrounding areas. Let them mine the surrounding areas. Little exploration and even less development are expected for almost all of these WSAs. We as a society do not have to dig up every inch of land that has the slightest capacity to yield something profitable. It is our opinion that the value of the wilderness resources in these nine WSAs far surpass the marginal and economically insignificant mining potential that these areas may have. In any case, should an area be determined to have some overriding mineral or energy potential at anytime in the future, Congress can always reverse the wilderness designation. On the other hand, once an area is scarred by mining, the damage to the wilderness resource is much more permanent.

I would like to acknowledge that there is some geothermal potential in a few areas, particularly in a fault line running across Gila Box and Turtle Mountain. However, there is no economic geothermal development in

Arizona presently, and little chance to turn our geothermal potential into any significant energy source. In any case, significant amounts of the fault line potential lie outside the WSAs or can be accessed with small changes in boundaries and little effect on wilderness.

I would like to summarize the above information by quoting your own conclusion on Impacts to Economic Conditions under the subheading Minerals, page 79:

Quote, none of the alternatives would have significant regional economic impact, unquote. That includes the All Wilderness alternative.

Ranching is often thought to be adversely affected by wilderness designation, especially by people who are philosophically opposed to wilderness. This is a bias which is, in almost all cases, simply incorrect. The BLM Wilderness Management Policy, as well as Congress, specifically protect existing and planned livestock uses and facilities. In the DEIS on page 68, under Impacts to Livestock Grazing, you reiterate:

Quote, livestock grazing, occurring before wilderness designation, can continue . . . . Wilderness designation would have an overall low adverse impact to livestock management in the nine WSAs . . . . Overall, allotment management plans would be implemented without impairing wilderness values or affecting the numbers of

livestock that could graze the range, unquote.

T-5

The one exception where supposed conflict is involved is Turtle Mountain. Upon examination, however, the conflict is really moot. Turtle Mountain is not recommended for wilderness partly because of, quote, problems involved in implementing a grazing system, unquote. Instead, as we were told by the BLM Area Manager two weeks ago, this implementation of the grazing system is being held up because of special wildlife values in the higher, relatively pristine areas of the unit, wilderness or no wilderness.

T-6

In addition, your view that Turtle Mountain is, quote, maxed out, unquote, with grazing improvements and any more would impair wilderness values excessively is a subjective interpretation which is yet to be demonstrated. You state that the impacts are well-distributed and are made largely unnoticeable, furthermore, has about the same amount of impact as Happy Camp Canyon and you recommend that unit saying that its impacts only slightly impair naturalness. So why is Turtle Mountain, which is even a larger area, so different?

Conclusion: Despite the fact that you have done a thorough and concise job with the DEIS and for the most part you probably feel that you have done the best you could, I still am very disappointed. I think you folks have really missed the boat. You treat wilderness like a bitter

T-7

medicine or like something you have to make excuses for. You find every opportunity to disqualify an area from recommendations: a bunch of mining claims with no record of production; an oddly-shaped boundary; quote, lower wilderness values, unquote, which cannot be justified in many cases. You even disqualify one unit, Day Mine, because it's not quite as nice as the unit right next to it. This kind of comparison is specifically illegal, as you well know, yet you try to get away with it anyway.

This has been a long process of disqualification, since the whole Wilderness Study Process began late in the 70's. Before this phase there was an inventory phase where you identified eighty-nine roadless areas totaling something under 350,000 acres. You shaved that down in 1980 to fourteen WSAs, five of which Watt illegally dropped from study last December and which the Sierra Club is presently in suit over.

Now for the last stage of the game, the public is left with only nine relatively small units. You are recommending further chopped-down portions of just four of these nine, totaling less than 35,000 acres. This in a district that manages 1.5 million acres. Wilderness, which is one of about five Congressionally mandated multiple uses, is regulated to only about 2% of the land that you manage. It looks like a plague you are trying to stamp out. I imagine that if your recommendations go to the Reagan administration, it will end up being even less.

This is completely unacceptable. It's sad. Wilderness management should adhere for at least 20% of the land you manage. Considering that nearly every multiple use except wood products' harvesting, is allowable to one extent or another in wilderness, it seems to me that wilderness management could be prescribed for even far more than 20%. This silly backward bias against wilderness, promulgated by mostly the timber and mining industries, is a blight on social awareness and sound land management.

Wilderness protects and enhances recreational values, wildlife, clean water and air, vegetation, cultural/historical resources, natural ecosystems, visual quality in the landscape, species health and diversity, the list goes on. We manipulate and often damage a vast majority of our public lands through resource development, use and abuse. We have got to set aside a number of large, healthy tracts of land where the philosophy is to protect and maintain what is of outstanding natural quality.

Every single one of the nine WSAs has outstanding natural qualities by definition, or else they wouldn't have gotten to WSA status in the first place. Some of the units have boundaries that may be adjusted. These adjustments, however, can go either way, making the units smaller or larger. Many roadless lands contiguous to the WSAs were disqualified earlier in the inventory phase for equally as spurious reasoning as some proposed for disqualification in the DEIS.

The BLM does not make enough of an effort to countereducate the public to what wilderness is and does. Especially the more local rural populations that time and again repeat worn-out and misleading slogans on how wilderness is anti-progress and anti-economic recovery. These views are indefensible and can be responded to effectively by a little effort on the part of the BLM. Please stop apologizing for wilderness and start promoting it.

I have some information on the Gila Box which I'll present at the end, however, unless I have -- how many minutes -- I went over on that?

HEARING OFFICER McHENRY: Your time is up.

MR. HIRT: Thank you. I will come back at the end if that's all right.

HEARING OFFICER McHENRY: Let me make a statement. Don't feel that you have to rush yourself in your statements. We will make adequate time for everybody to get a chance to speak. The court reporter is kind of burning her fingers out here.

Our next speaker is Marilyn Lane.

MS. LANE: My name is Marilyn Lane. I live at 756 West Kelso, Tucson, 85705.

I would just like to make about three points: first, I'm in favor of a great deal more wilderness than has been recommended by the BLM in this Draft Environmental Impact Statement. I was just figuring it out on my calculator and it came out somewhat less than 3% of the land recommended. Now, I don't know. The way I look at it, for those of us that use wilderness areas, and I think there are a lot of people in this state -- in the country -- that use wilderness areas, hiking, boating, camping, any of these things. You've got an awful lot of people that you're trying to accommodate on an awfully small area.

The second thing I would like to address is Turtle Mountain. I remember that this was an area which contained some Bighorn Sheep and I personally think that these are lovely animals and I think that, in my opinion, just the wildlife itself should be grounds for designating this area wilderness; just specifically to save these Bighorn Sheep in this area.

Third, I would like you -- to urge you, rather, to make the Gila Box a wilderness area. This is one area that I have been into and it is extremely beautiful. It has a beautiful habitat and the fact that it contains the two rivers, as well as that, the riparian area, I think this makes it a unique area in Arizona, especially in Southern Arizona where we don't very often encounter this type of habitat. For this reason I feel that it should be included as a wilderness designation.

I'm really concerned about off-road vehicle usage in the area. I remember the time that I was up there that we did have some off-road vehicles along in the area and they had been tossing beer cans out of their vehicles. I was pretty much appalled that they should do so, but -- okay.

Just in closing, I feel that the Draft Environmental Impact Statement should have taken more account of the hikers, boaters, campers, and other users of the area such as wildlife, rather than leaving most of the Environmental Impact Statement slanted toward the off-road vehicle usage. Most of the recreation usages were: how was the off-road vehicle user going to use the area? I don't have an off-road vehicle, but I am, every once in awhile, a hiker, and I do appreciate being able to use a wilderness area in this fashion. Thank you very much.

HEARING OFFICER McHENRY: Thank you. Before I call the next speaker, I would like to make an announcement. There will be a fire alarm alert during this meeting. If you feel it's necessary to leave, go ahead and do so. But they are just testing the alarm system this evening, so if you hear the fire alarm go off, we'll probably stop the

speaker and wait until it's finished and then go ahead with the meeting.

Our next speaker is Jeanne Broome.

MS. BROOME: I'm Jeanne Broome and I live at 7565 Sabino Vista Drive in Tucson.

I would like to speak mainly about the Needle's Eye, which was the first one of the Wilderness Study Areas that the map showed. It was a very tiny one up in the corner. It's also part of the -- it's on the Gila River; the southern and eastern boundaries are the Gila River and the northern boundary is the San Carlos Indian Reservation. These mountains are very, very different in appearance than most of the mountains in Southeastern Arizona. They are composed of massive beds of limestone dipping steeply to the south, and this results in very striking topography; the relatively flat dip slopes contrasting with steep cliffs. Really it's super spectacular, as a matter of fact.

All along in the middle of this is the Mescal Creek, and along this creek there are remnants of collapsed limestone caves, complete with all the stalagmites and stalactites and stuff.

At the foot of the large cliffs along the creek are the numerous little springs that come out, each supporting lush growth of ferns and mosses. Walking down

Mescal Creek, the topography is very, very rough. It's just, you know, lots of massive rocks. In this area there are power lines and that is one of the reasons that, you know, there was some question about it. But the topography is so rough that the power lines are really not visible until you are right under them, and then only for a little while. So they are not as big a problem as I would think just reading about it.

The only wildlife siting that was encountered was a bear. I mean, there were some birds and things, but it was really pretty spectacular, and I don't know what a bear was doing all the way down there, but maybe he wanted a drink.

It was not possible to visit the northeast corner and view -- on the proposed wilderness area or the area that the BLM would propose adopting as wilderness, there is a little corner left out of the entire area, and this is a way; and a way is another word for a road, and this one is not at all developed. However, the rancher in that area does seem to use this and it wasn't possible to visit this area at this time of year because the river was too high. So we, you know -- that will undoubtedly have to be left for further study or to be, you know, to leave off that tiny corner probably would not impair it too much.

It was also not possible to visit the Needle's

Eye itself this time because that's most accessible by floating down the Gila, and right now the Gila is so high it's pretty dangerous to go floating on it. It was also very hot to go hiking to it, so we didn't visit that, either.

We definitely think that this area should be given wilderness status. There is a desert vegetation type in this area that's not found in any of the other proposed areas, and the limestone beds hold great potential for paleontological study. They have found some invertebrate fossils in this area. I really don't know how extensive that research has been, the survey for that area, but other than that, it's just a fantastic area for recreation. It's secluded enough to be fun for camping and picnicking, and that sort of thing, and it's challenging enough for hikers.

It also offers tremendous amounts for fisbermen and those people that like to be near the water. In general, it's an absolutely beautiful area. The BLM does recommend it for wilderness and we definitely agree with their recommendation. It will be an asset.

I also visited the Black Rock area and I definitely think that it should be included, too. Gayle Hartmann will give more details on our visit to that. Thank you.

HEARING OFFICER McHENRY: Thank you very much.

If you represent a club or organization and wish to let us know which club or organization you belong to, that's fine. If not, your name and address is welcome.

Our next speaker is Candy King.

MS. KING: My name is Candice King. I guess I put down Candy. It's 3700 North Campbell, No. 813, 85719.

I'm not very organized in what I want to say, but I just want to say how I feel. I was born in Globe. I'm a native Arizonan. I have lived here all my life, except for one year when I went to Colorado. My father was in the Parks Service for twenty years and I visited many areas in Arizona when I was young that I can't remember specifically, but I know they gave me a great appreciation for wilderness.

Both my mother and father were archaeologists and the archaeological sites are very important in these areas. They are something that once they are disturbed, the total value is gone. I feel we should have more wilderness.

I haven't had time to visit most of these areas, but I hope that by designation of wilderness, that I would be able to. I would like to be able to, when I have children, to be able to take them to places that I had seen, and many of the places that I have been to when I was younger aren't there now, and I don't want these places to become that way now.

I feel that the wilderness areas, the vegetation, the wildlife, are very important. The Gila Box is extremely important. Especially if you were raised in Arizona, you know there are not too many free-flowing rivers to see in the desert country. I feel that more people hike in these areas. There is off-road vehicle usage and you may have more problems with trash and throwing things away because when you hike in, you're not so likely to take so much stuff that you can litter with because you have to take it on your own back.

I just feel that we ought to make a commitment to keep the wilderness for the people now in the cities, that are locked in the cities and for any generations that come afterwards, because once they are gone, they can't come back.

HEARING OFFICER McHENRY: Thank you very much.

Ladies and gentlemen, five minutes is a long time. That last presentation was two minutes. Do take your time and explain as much as you want to.

Our next speaker is Linda Jakse.

MS. JAKSE: I am going to have someone else speak for me because I get stage fright real bad as soon as I stand up there.

HEARING OFFICER McHENRY: Fine. Who is your stand-in?

MS. JAKSE: She'll tell you.

MS. CUMMINGS: My name is Martha Lynn Cummings. My address is 247 East Adams, Tucson, Arizona, 85705. I'm speaking as a member of Earth First, and for the group's disappointment with the DEIS recommendations and goals. Earth First believes in a reestablishing of large ecosystems preserves for regional as well as global health. These preserves will be managed as wilderness, though in a stricter sense than the compromised type of pseudo-wilderness proposed by others, such as the Sierra Club.

A true wilderness will have livestock fences and developments removed; no mining or energy development may take place; motorized vehicles will not be allowed under any circumstances. Impacts will be removed and regenerative. Exportated native wildlife will be reintroduced and absolute standards of purity in air quality and water quality will be enforced, which means no acid rains and strong pollution controls on nearby smelters, or shut them down.

One very small Earth First ecosystem preserve lies in the EIS area and includes a single unit composed of the Graham Mountains, Santa Teresas, Aravapai area and the Galiuro Mountains.

Another possible preserve we are considering would be a Gila/San Carlos wilderness including all of the Gila and San Francisco Rivers from Morenci and Highway 666 to Safford, and all of the lands -- the Gila drains in a horseshoe-shape with Highways 666 and 70 forming the southern boundaries and the San Carlos Indian Reservation forming the northern boundaries. This would include Fishhooks, Day Mine, Turtle Mountain, and Gila Box, which should be immediately designated.

Earth First policy is to designate all federally identified roadless lands as wilderness. That means all RARE II Forest Service lands and all BLM lands identified in the intensive inventory. This would provide a base for the larger ecosystem preserves in the future.

I would like to read from an Earth First publication an article which may clarify the philosophies behind this; why we feel that this is necessary in this country:

A good wilderness law should set some lofty goals. Ours doesn't. The new law should lay a sound philosophical foundation for a preservation of wilderness.

A primary stated goal should be to protect functioning and diverse ecosystems in the most complete manner possible. It should, number one, set an ultimate goal of maintaining about 25% of this land as wilderness in this country.

Like most of our politicians, I would like to see a balance achieved between wilderness and nonwilderness uses. But a quarter of this magnificant landscape in this country, I believe, is an eminently reasonable goal for a balance. You may consider that some of the Third World nations such as Kenya and Botswana have already designated 20 to 30% of their land to national parks and preserves. A good wilderness law should set as a national goal the creation of an ecological wilderness, something that in every major native ecosystem in the United States would have an area picked out to be protected in wilderness. I think that time is running out for the American wilderness. In this decade, in the 80's, we are making our last decisions, major decisions about what areas can no longer be gone into and developed. The Southwest is a primary area that this is happening in. This is very instrumental in how much land is left in the United States as a wilderness area. It is one of the more under-developed areas by our national population standards.

I would like to see this area, for ecological reasons, for archeaological reasons, and for the enjoyment of people who are willing to hike in and willing to camp and boat and take care of their provisions and to take them out with them, be preserved for our future generations. Thank you very much.

HEARING OFFICER McHENRY: Thank you. Our next

speaker is Sid Hirsh.

MR. HIRSH: My name is Sidney Hirsh and I live at 4322 East 7th Street here in Tucson.

Wilderness is important to me for recreation. There is a real need for lands that are freed from the smells and noises of motors. I urge that the Bureau of Land Management recommend wilderness status for at least the remaining nine Wilderness Study Areas. Indeed, I feel that these wilderness recommendations do not provide sufficient land for a growing population that is demanding more and more areas for primitive recreation. Thank you.

HEARING OFFICER McHENRY: Thank you. Our next speaker is Mike Cease.

MR. CEASE: My name is Mike Cease and my address is 2039 East 7th Street.

First of all, I would like to say that I support designation of wilderness for all of the nine WSAs being considered.

Specifically, I would like to address the consideration of the Day Mine Wilderness Study Area. The proposed action in the Draft EIS is for no wilderness at all; no designation in this area. I strongly oppose this proposed action and I do not support the recommendations of the Draft EIS in this regard.

If I can, I would like to read here from the

Draft EIS. It says, quote, the WSA is not recommended for wilderness designation due to lower wilderness values and the presence of similar but higher values in the adjacent Fishhooks Wilderness Study Area.

Okay. I strongly disagreed with that reasoning. This area has extremely high wilderness values. I have visited the Day Mine area. In short, what I can say having visited the area, is that it's a tremendously beautiful area. If we were to use this same sort of reasoning that's been applied here, there would be no canyons, other than the Grand Canyon, designated for national park areas. So I happen to believe personally, in my own opinion, that that's a rather a absurd argument.

T-8

One of the things I would like to point out in reference to the Day Mine area is that it is actually contiguous with the Fishhooks area. I can point this out on the map if that would be helpful. The way that the Draft EIS has drawn the boundaries, they've eliminated the southern portion of the Fishhooks Wilderness Study Area so as to make it appear as if these are not contiguous when, in fact, they are.

If you visit the area you can see that it is definitely a contiguous area and that the only thing that separates these two areas is what's called "the way" through there, which is basically a Jeep trail. Okay. So, again,

T-8

I wanted to underscore that this is, I believe -- I guess he's pointing this out on the map here.

MR. KNOX: I didn't want to interrupt. I'm sorry.

MR. CEASE: I just wanted to underscore that these two areas are contiguous, and if one visits the area you can see that is definitely a contiguous land area.

There we go.

(Whereupon, Mr. Knox indicated the area in question on the map.)

MR. CEASE: I don't know if you can all hear me, but this is the proposed boundary (indicating) that has been proposed for the southern portion of the Fishhooks area. But, as you can see, in the original outline -- this is the Day Mine area down here (indicating). In the original outline this is all a contiguous area, which makes for better manageability. So I think this is an artificial boundary here that the BLM has recommended for cutting out the southern portion of the Fishhooks area here (indicating). This is actually the Fishhooks (indicating) and the Day Mine area are both a contiguous region.

One aesthetic note I would like to make is that just having visited the area, it's a very beautiful scenery. Not only in the area, but the surrounding area. From every part of the Day Mine area that I was in, there are spectacular views in virtually any direction that you want to look.

T-9

Another comment that was made in the Draft EIS indicated that no adverse impact to wilderness values would occur with nondesignation. That was a secondary argument used. I strongly disagree with that argument. It may not affect the wilderness values today; however, I'm concerned with what's going to happen in the long-term and in the future and for succeeding generations. Okay.

T-10

Finally, I would just like to underscore that the reasoning for not designating the Day Mine area as wilderness is not acceptable at all. The Day Mine area cannot and should not be compared to other wilderness values. This is a unique area and it has inherent wilderness values and stands on its own, I believe. Thank you.

HEARING OFFICER McHENRY: Thank you. That was five minutes.

Our next speaker is Helen Coshland.

MRS. COSHLAND: My name is Helen Coshland. I live at 4711 Brisa del Norte in Tucson. I have been a resident of Tucson for fifteen years.

I strongly support wilderness status for all of the nine WSAs, as well as any others that you can get back. I was glad to see you had put Happy Camp in, but there are many other things that I don't know as well as I

know Happy Camp, and so I'm sure they need to be in, too. There probably are some boundary adjustments that will chop a few bits here and there, but those WSAs are really important for this part of the country.

Today I have been reading in the Territorial newspaper about all the houses they are going to build and all the population increase we're going to have. And that is not only for Tucson, so that we need a lot of wild space. Even if you don't go to wild space, to know it is there is very comforting to the spirit.

So I strongly urge that we try to have a re-evaluation that we give a great deal more wilderness status to this District of Safford. Thank you.

HEARING OFFICER McHENRY: Thank you. Our next speaker is Robert Coshland.

MR. COSHLAND: My name is Robert Coshland and I reside at 4711 Brisa del Norte in Tucson.

I would like first to address one question that was raised in comment on the quality of the Draft EIS. Mostly it's a clear, forthright statement. It does leave some things to be desired, however.

T-11

In the first place, defined back in 1980, there was a proposal report, May, 1980, of the intensive inventory of public lands administered by the BLM. In this report there is a summary of the results following the

initial inventory and in this study thirty-four units were inventoried in the Safford District. Now, my question is, we're down to nine units being covered in the present Draft IES: What has happened to the other units in between?

We found that the Safford District, out of these thirty-four units that were inventoried, came up with nineteen WSAs which were strongly recommended for further study. Now, out of those nineteen, we're down to nine covered at present.

I feel that the public is entitled to know in this EIS what happened to the ten that fell through the cracks.

Now, I represent only myself; no organization. The reason I'm representing myself is because this is my land. These million and a half acres that the BLM administers here are my land and the land of all the other people in this room. The BLM when they came out with their program for inventorying and the progressive steps of accomplishing the wilderness study four years ago, had an excellent plan and I think we all applauded it. It marked such an improvement over what we had experienced with the Forest Service Wilderness Studies. You all started out fine, but since the Reagan administration has come to power, it appears that some of the intents that were expressed originally have fallen by the wayside and we find now that the program seems

to be one of eliminating rather than promoting wilderness areas. This is an attitude which I feel needs to be much more objectively pursued than it seems to be at present.

T-12

Now, on page 51 there is a section there on public attitudes that were obtained. This is under the heading of Social Elements. The social elements addressed in this section of the DEIS were obtained by interviews of residents of Southeastern Arizona and Southwestern New Mexico, and primarily, when you spell it out by the various CCD's in which you made the analysis, the interviews were conducted with the local residents, and I sense in this that far more weight has been given to the attitudes of local residents than to people who live further away. If this were a hearing on the suitability of, let's say, Yellowstone Park, and there was a threat of geothermal development in that area, you would have -- you would be swamped with people at this hearing because people happen to know about the geothermal possibility. Also the fact that Old Faithful there like has the sanctity of motherhood to most people who have ever been to Yellowstone, but these people haven't been to these remote areas down here. The local residents, they are in a position to talk about them, but you don't find people coming great distances because they are remote and inaccessible.

For this reason, it behooves the BLM to give these areas greater protection for the benefit of those millions of people who don't know about the areas. I think you probably get the point there.

T-13

Also, there is a point in the EIS that I want to point out, on page 15, where it talks about the three potential -- let's see. There is No Wilderness and the All Wilderness alternatives and then it says that there are three Partial Wilderness alternatives and one of those three is the Proposed Action. Well, Proposed Action isn't an alternative. You have nine districts, nine WSAs; five of them have No Wilderness, so that's not an alternative for them. The other four get only moderate wilderness and you haven't given any weight at all to anything in between. So you don't really have three Partial Wilderness alternatives. The Proposed Action is not an alternative.

Now, getting down to some specifics, in chapter 2 where the alternatives are discussed in detail with respect to each of the nine areas, it just looks to me as though there are some pretty lame excuses given for non-wilderness designation in the five areas which you receive as not designated. Others this evening have touched on some of those and I don't think I need to repeat them, but the uses are remote. It seems as though the writer has reached for something to suit a particular purpose.

In chapter 4 where it --

HEARING OFFICER McHENRY: You have one minute.

MR. COSHLAND: Thank you. In chapter 4, the Environmental Consequences of Gila Box, on page 60, there is no question but Gila Box qualifies. The fact there are ORVs in there should not be an excuse for disqualifying it. If the area meets the necessary criteria, it should be wilderness and see about the enforcement of it after the designation has been made. If the ax falls on the ORVs -- but the fact that they're there shouldn't prevent the area from being designated as wilderness.

In all the WSAs, the benefits of wilderness designation appear to far outweigh the drawbacks. The two areas in which I would concur is in Peloncillo Mountains where the boundaries do present problems, and I do concur with the decision on Happy Camp Canyon. I think that's been properly handled.

If my time is up, I'll stop here. Thanks.

HEARING OFFICER McHENRY: Thank you very much. If anybody else is keeping time with me, I gave him the other four minutes from Helen Coshland's statement.

MR. COSHLAND: Thank you.

HEARING OFFICER McHENRY: Our next speaker is Douglas Stephens.

MR. STEPHENS: I live at 1216 North Cherry, Tucson, 85719.

First of all I would like to say that I strongly support wilderness designation of all nine of these WSAs. In particular, though, I would like to speak about the Turtle Mountain area. Your Proposed Action for the area is No Wilderness. Your reasons were poor wilderness qualities. Well, I am familiar with the area and I disagree with that. I feel it has very strong wilderness qualities.

T-14

Another reason for your Proposed Action was problems of manageability. I realize there are state inholdings in the area; perhaps a trade might be worked out with the state to eliminate that problem or even a -- if you could go back and redefine your boundaries to sort of work your way around these inholdings, because I feel that the ridgetop areas in the area is very important to be preserved. They are not being grazed too heavily right now.

T-15

There is Bighorn Sheep starting to move into the area and -- well, you also -- another conflict was implementing a new grazing system to those ridge areas, and two weeks ago you said that you were not going to allow this rancher to implement the new improvements to his grazing because of conflicts with the Bighorn Sheep. So, therefore, I don't feel that that is a good reason to not designate this area a wilderness.

Your decision not to allow any new improvements in the area I feel is a good decision; however, without

any real legislation, your decision can be changed in the future, where if this was designated wilderness, the areas that you've -- that should be protected, would be protected. That's about all I have to say about Turtle Mountain.

Javelina Peak: I visited that area and I felt that your -- well, you decided that low wilderness values were the reason-- well, one of the reasons for not designating this a wilderness area. I felt that -- I've traveled around the state. I'm a native of Arizona and I've traveled extensively around the Southwest as a whole, and

T-16

I felt that the sand dunes and the badlands in the area were very unique. They're being threatened by off-road vehicles. Designating this area wilderness would not affect the off-road vehicle use that much for the users of off-road vehicles because the area to the south is much -- is similar to the areas that would be within the boundaries of the wilderness area.

You say that you have a problem with managing the area. I can see where there would be a problem with managing the area, but I feel that it should be designated wilderness to try to somewhat put a stop to the destruction of the environment caused by off-road vehicles. The sand dunes and the badlands are very fragile and they are being very much so destroyed by off-road vehicles. That's about all I have to say. Thanks.

HEARING OFFICER McHENRY: Thank you. Our next speaker is Tim Vanderpool.

MR. VANDERPOOL: My name is Tim Vanderpool. I live at 1216 North Cherry in Tucson.

To start off, I would like to speak concerning the whole philosophical basis behind what I see in here. It appears to come down from the conservative nature of the administration, which is, you know, somewhat obvious when I read this. It seems that -- okay. From Watt on down there seems to be an ideology of getting rid of all the lands we can. I feel that this possibly could be -- not possibly, I feel that it is economic in basis.

You have many industries which, you know, your timber industries, your mining, which is very strong in Arizona, would love nothing more than to be able to exploit all the possible areas that would bring them profit. When you look at these areas, any area that has even a smidgen of economic value, it seems to be opened up. What I mean to say is that there is no benefit given really to wilderness area, as long as there seems to be a tiny bit of economic value, which, I suspect, isn't really there.

Case in point, on the -- well, one of my special areas -- we each took special areas in this and I spent some time in the Fishhooks region. Me and Mr. Cease. We went down the Day Mine Wash, which is in the lower part in between the areas which you want to cut off. It's right here (indicating).

Now, this is another interesting point while we're here at this map. You come down this wash -- this road is somewhat of an eyesore but it's generally hidden from the other areas -- but if you're in this wash you'll see this (indicating). If you're not, you won't. I don't know if that's really an argument against designating the area a wilderness or not. What you have here is a cherrystem that looks like a major freeway on this map, which actually -- I have a little photograph. It's not really real great, but -- where is it here? Mr. Cease walking on the said cherrystem road, which is a big red line on the map, and in reality is a bunch of weeds with two little tracks where somebody apparently went at one time or another.

The same with this (indicating). Now, this area (indicating), this goes up into the Day Mine area. It's not a road, it's -- you can tell that something has been driven there at one time, and you look at the maps, you know, you look in here (indicating) and they are just -- they are major roads. I mean, it looks like it's a major outlet up into that area, when it's actually nothing.

I feel that this is propaganda to a degree. I mean, the uninformed person that doesn't go up there isn't going to realize it. When you get up in the area and you look, you know, it's really not much. It's not much. Okay.

T-17

Concerning Day Mine in relation to Fishhooks, well, obviously I support Fishhooks as an All Wilderness area and Day Mine. There is a beautiful mountain range up there of which -- what the deal is, okay, Fishhooks comes down ridges and ridges of the Gila Mountains. This road of Day Mine Wash goes in the middle and then you have Day Mine area to the, you know, below it, which is one continuous mountain range. The judgment used to say that Day Mine wasn't up to the value of Fishhooks is absurd. It's just as beautiful as Fishhooks and it's actually a continuation of the Wilderness Area. It has the same aesthetic values as Fishhooks and it's -- there is -- you can't really see these, but there are some very interesting rock formations in Day Mine that are just really unique.

It's very green, greener than I expected. A lot of beautiful growth. There is another picture -- and these are pretty bad -- but this shows when you're looking in at the whole area -- and I wasn't at the first conference last week, but the impression I got was that some people were somewhat misled because the photographs showed by the BLM showed this area in more of a crossway which you don't even see the mountains, and when you get up there and you look into it -- now, this is Day Mine. This is the area that is going to be dropped from wilderness (showing picture).

I mean, it's a beautiful area. It's full of lush, green growth and it's just really absurd that they want to drop it. I mean, I can't see the reasoning behind it.

One more point I would like to make is as far as the mining claims. Well, the EIS says that there are seventy-six mining claims in the area, you know, more or less. I didn't have a chance to get into Safford and really find out how many of these areas were actually still, you know, were -- I don't know what the word is -- in use, or their leases had been, you know, sustained, but I somewhat doubt that many of them are. As far as the EIS, it says, even, that these areas, there is low -- I mean, they don't expect them to be heavily used at all, and yet they use this in a strong argument to say that these areas should be dropped. It seems to be somewhat of a catch-22 situation to me.

T-18

But, anyway, I just want to say that I support all the nine areas and I think that it's absurd that you should drop Day Mine area. I think the argument is absurd and I think if you would really go up there -- I mean, somebody has obviously been up there to see it -- maybe -- I'm not sure -- but I think if you go up there and hike around a little bit and see what it really looks like, you might even enjoy yourselves. Thank you.

HEARING OFFICER McHENRY: Tim, did you wish to put the photos into the record?

MR. VANDERPOOL: Should I label them first?

HEARING OFFICER McHENRY: Yes, why don't you do that.

Our next speaker is Jim Notestine.

MR. NOTESTINE: I'm Jim Notestine from P. O. Box 461, Sonoita, Arizona.

I am an off-road vehicle driver, but I support very strongly all nine units. If I didn't have some wilderness at the end of some of these Jeep roads to go to, they wouldn't be worth it. I also would actually like to see the BLM go back and consider some of the units they've dropped; at least the fourteen units they were considering before these nine. That is a small fraction of the eighty-nine they started out with, and they were all good units. Okay.

After that I would like to emphasize Happy Camp Canyon and thank you for including that, since it does have some conflicts. I think they're minor; there are some mining claims in there. I don't think that they will conflict with the area and I think you've dropped most of the controversial areas.

I would like to emphasize the very excellent riparian areas that occur in that area. Happy Camp Canyon,

Happy Camp, and Tar Box are all very excellent riparian areas. I have heard criticism of the unit as a wilderness area because of the lack of opportunities for solitude in the fact that there was visible sights and sounds from the outside world. That's baloney. You don't have to go very many feet into that rugged granite area above the Happy Camp Canyon until you are totally away from the sights and sounds.

It is the area that Geronimo hid his whole tribe from the whole U.S. Government Force for how many months? Five miles away from Fort Bowie and they never found him there, so there are opportunities for solitude there. Okay.

The area below Government Peak is very similar to the Dragoon Mountains in the Cochise Stronghold areas. It has streams, waterfalls, exfoliating granite domes. It almost compares with portions of Yosemite National Park if you put it on a small scale. It's really an unusual area. The one exception I have to your recommendation is an area -- and I don't know if I could go to the map and show you that.

(Whereupon, Mr. Notestine went to the map to point out the area.)

T-19

MR. NOTESTINE: I think you basically included the Happy Camp Canyon watershed and there is a continuation

T-19

of that area; the beautiful granite area goes over into this state inholding here (indicating) and I would like to see the proposal go on around this area and include this here (indicating) and try to go for a land exchange with the state. This area in the 9-mile Creek area is very similar to the area that you've included here; very gorgeous granite area, and then below Government Peak are some very nice high-hanging valleys with some very huge junipers, some very nice wildlife zones. There are turkey there, a lot of big game up in that area of the mountains, and I would like to see that included in the unit. Otherwise, I agree with the other boundaries because of the conflicts.

Just a few words on some of the other areas. I agree with your choice on Needle's Eye. I've heard about the conflicts on the powerlines. I agree with some of the previous speakers that that powerline is not a problem. It's not an intrusion that impacts the area. I also strongly support the Gila Box. It is an outstanding riparian area; one of the nicest in the State of Arizona; one of the nicest in the Southwest. It's important for wilderness protection for that. It's a well-known area for its birdlife and wildlife and I have found that off-road vehicle use is a conflict with a lot of wildlife that you would find in there, and I would strongly urge that Gila Box be included.

T-20

I also strongly urge that the Peloncillos be

considered. It's another very, very pristine, very beautiful area with nice canyons and nice vegetation. At first glance the boundary looks nonmanageable, but when you look further and realize that it's mostly BLM land around that, it is an area that BLM can manage the wilderness area, I feel. A few state land exchanges would make the unit even finer, but by protecting the unit, the Peloncillo unit that you have dropped there, you would protect the core of the area and I think you could manage the BLM areas around it adequately. Thank you.

HEARING OFFICER McHENRY: Thank you very much. Our next speaker is Gayle Hartmann.

MS. HARTMANN: My name is Gayle Hartmann. I live at 2224 East 4th Street in Tucson.

I would like to speak about two specific units here this evening: Black Rock and the Gila Box. I would like to first comment on some of the physical characteristics of Black Rock for people who are not familiar with the area.

As Mr. Rosenkrance pointed out, it is located in the northern foothills of the Santa Teresa Mountains and includes several outstanding topographic features, including Mesa Holdout Canyon, Jackson Mountain, Mud Spring Mesa, and Black Rock itself.

Holdout Canyon was aptly described by Pete

Cowgill, the outdoor editor for the Arizona Star, a few years ago, as follows: Quote, it would be a perfect hold-out. A whole army could try to worm its way through the area and easily pass by a person holed out in many of a million little caves or alcoves.

Black Rock itself is a large volcanic plug arising about 1,000 feet out of the surrounding lands. There are falcons and we were fortunate enough to see one eagle in the area. It's also great fun to climb, providing, as the Draft EIS would put it, quote, an outstanding recreational opportunity, unquote.

The BLM supports a partial wilderness proposal for this area that excludes nearly 2,000 acres of the possible 8,492, on the grounds of mineral conflicts and manageability. In regard to mineral conflicts, the All Wilderness proposals carefully exclude an area along the WSA's eastern boundaries that includes a small fluorspar mine. This mine, a 1- or 2-man operation, does not appear to be operating currently, but did produce 1,200 tons of fluorspar in the 1950's. As the All Wilderness proposal would allow this mine to continue to operate, there seems to be no good reason to adopt a smaller Partial Wilderness for the purpose of avoiding mining conflicts.

The eastern and southern boundaries of the WSA followed the San Carlos Indian Reservation and section-

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lines, section boundaries. They're easily defined and seem more manageable than the proposed boundary for a Partial Wilderness, in most cases. However, a road, apparently very new, and this is not a small track with grass growing through it, this is a road, is near the eastern boundary inside the WSA, and there will require some adjustments in this area. I'm not sure how long this road has been there; it doesn't look very old.

After having visited the area and examining documents at the Arizona Bureau of Geology and Mining Technology, we believe that with minor adjustments to exclude the above-mentioned road and possibly the dangling southeastern corner of the area, the All Wilderness proposal is the most suitable for Black Rock.

Gila Box is everybody's favorite, so I have to say a few things about Gila Box, too. Most of what I have to say are simply extracting quotes from the EIS because it claims, it says what a wonderful place it is. For instance, it is described as, quote, the last free-flowing stretch of the Gila River in Arizona, unquote, and, quote . . . running water, rugged and colorful terrain, highly-eroded geologic formations, and diversity of plants and animals produced outstanding scenery, close quote.

Quote, opportunities for solitude are outstanding, close quote.

"Gila Box WSA offers many opportunities for primitive recreation."

"Riparian vegetation, uncommon to the Southwestern U.S., greatly enhances wildlife habitat in the WSA."

Those are all direct quotes out of the Draft EIS. The area also contains numerous important archeaological sites, and, in fact, is rated high in the EIS in that regard. For example, a large prehistoric village is located at the mouth of Eagle Creek.

T-22

For all these reasons the Gila Box deserves full protection as a wilderness area and yet it has not even been nominated. The No Wilderness nomination has apparently been made for two reasons: (1) the possible potential for geothermal development, and, (2) conflicts with off-road vehicle users.

Geothermal energy may become important in the future, but the Gila Box, being distant from major urban centers and having high wilderness and cultural value, seems most inappropriate as a major source of geothermal power. The high wilderness and cultural values of the area also make it incompatible with ORV use. The Draft EIS even states that, quote, greater vehicular access could lead to increased vandalism of cultural resources, unquote.

As we all know, wild, perennial streams are a scarce resource in Arizona. My personal reaction to the

Gila Box was one of delight, that such a lovely area remained in such a pristine state. I would very much like it to remain that way and strongly believe that in spite of minor management problems, all 17,831 acres qualify for wilderness. Thank you.

HEARING OFFICER McHENRY: Thank you very much. I would like to take a 10-minute break for our court reporter.

(A brief recess was taken.)

HEARING OFFICER McHENRY: Ladies and gentlemen, the hearing will now come to order.

Our next speaker is Dave Makepeace.

MR. MAKEPEACE: I have a brief oral statement to make and I'll provide written comments on your Environmental Impact Statement and on the proposals in the Environmental Impact Statement at a later date prior to the closing of the hearing record.

First of all, I would like to say I would like to register my support of the All Wilderness alternative, even though I believe it is not enough. The wilderness habitats of our country have always taken a second place to economic development and I think it's time that we begin to turn this trend around.

Secondly, I would like to make some specific comments about the Gila River. I'll preface my remarks on that by saying that while I'm a newcomer to Arizona, in the past two years I've made something like six raft trips down the river and I've hiked in the adjacent lands. I've led educational activities in the river; taken two school trips down the river, seventh graders, fourth graders, and senior high students. My school has also taken other students down with other leaders into the area and I believe it's a very valuable natural resource. So obviously I support designation of this unit, the Gila Box, and I would also like to say that I believe the boundaries should be expanded and that this is a case where some purchase of private lands is appropriate, or exchanges of other public lands for the private lands.

T-23

I'm speaking of the Phelps Dodge lands along Eagle Creek, I believe Eagle Creek, up to just below the pumpstation, should be included in the unit. I'm not sure of the current status of the Bat Cave above the pumpstation, but if it is not in public ownership or is not in a protected status, that the BLM should take some steps to see that it is.

I have several reasons for wanting the Gila River to be included and for you to change your recommendation concerning the Box. One is that your report by Minkley, Dr. Minkley, and Summerfield, from A.S.U., clearly --

HEARING OFFICER McHENRY: Here's the fire alarm. Why don't you hold on for a second and I'll give you some added time.

Any of you that wish to step outside, please feel free to do so.

Do you think you can talk over that?

MR. MAKEPEACE: Sure. I would be glad to, as long as everybody can hear me.

HEARING OFFICER McHENRY: We can wait. Is there any way that we can turn his mike on?

(Whereupon, a brief off-the-record ensued.)

HEARING OFFICER McHENRY: If you'll speak into the microphone, I think the audience will be able to hear you.

MR. MAKEPEACE: The report prepared by Dr. Minkley and Summerfield from Arizona State University, under contract to the Bureau of Land Management, clearly defined and documented the diversity of wildlife and plant species within the area and its many other natural attributes. As the conglomerate of these attributes that your agency has documented, supported by the National Public Lands Task Force Report by Nicholas Van Pelt, that clearly states that the unit is a unique and irreplaceable component of our natural heritage at the national level. It's a component that can be lost through the continuation of not

only the past, but the present management directions.

Secondly, the area is vital to the support of migratory wildlife such as Raptor songbirds and bats and continued deterioration of the habitat will result in a decline of some of these species at the national level of significance.

Thirdly, a designation of wilderness would be a clear and straightforward statement of management intent, intent by your agency.

Fourth, special status provided by wilderness will relieve the economic pressure for development and open up opportunities for alternative and progressive management.

Next, the area provides a vital and continuing education resource of a type that is rare in the United States and specific to the Southwest. I mentioned that the Gila was in a deteriorating state. The Gila is, regardless of its value that we recognize and that we've had much testimony devoted to, and regardless of its resiliency as a natural ecosystem, it's in distress, and the stresses that are being imposed by man and his domesticity are extensive and severe and these stresses are evidenced by adverse modification of the hydrologic regimen; excessively high sediment living in the stream; the historical decline and diversity of in-stream fauna; the reduction and/or elimination of reproductive stages of riparian tree species, and

the shift of all plant communities towards a dominance of the species unpalatable to cattle.

These things haven't occurred overnight, nor have they occurred at the hand of a particular user group. We can certainly point fingers, but that's really not fair. These adversities will not be rectified quickly or as a result of a single action such as wilderness designation. In fact, the BLM should pursue a diversity of management activities within the entire drainage basin if the Wilderness Study Area unit is to be enhanced, maintained, and generally improved.

HEARING OFFICER McHENRY: You have a minute.

MR. MAKEPEACE: Okay. I guess a couple of things that I picked up out of your EIS, which I've only started to read, is that thirteen out of the eighteen species of rare endangered or sensitive wildlife species that are listed for all of the WSAs for study have verified sightings within the Gila Box, and the next closest WSA that meets -- that comes close to that is six verified sitings, and that's at Fishhooks, and I think there are two others that have six verified sitings.

I personally have observed two pairs of black hawks in the area, and eagles, and certainly I have observed a free tail -- Mexican free tailed bat. These kinds of resources are the very reason why it is imperative that the

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area be designated wilderness.

The reasoning of ORV conflicts for eliminating the WSA from consideration is specious. It is for these values by themselves that ORVs should be eliminated from the area. As a professional wildlife biologist with quite a few years of experience, I personally believe that this conflict and harrassment by specific user groups such as the ORV people is a justification for including it for recommendation and not a justification for excluding it. If we are to maintain this valuable resource for all of us people sitting here and all of the other folks sitting around the country that pay your salaries, then we must have some cooperation from the Federal Government. I hope that we will see that cooperation in a modified final Environmental Impact Statement that includes Gila Box. Thank you.

HEARING OFFICER McHENRY: Thank you very much. Our next speaker is Dan Fischer.

MR. FISCHER: My name is Dan Fischer. I reside at 835 East Orange Grove Road in Tucson. I would like to read in the record a letter which I have written to Mr. Rosenkrance:

"This letter is written in response to the draft environmental impact statement (EIS) for the wilderness designation of wilderness study areas in the Safford District of southeastern Arizona and adjoining lands in

Eastern New Mexico.

Public lands that qualify and are designated as wilderness can be viewed as a resource with an expression of worth and value for the following reasons:

"1. Clean, unspoiled watersheds.

"2. Beautiful and unmarred vistas.

"3. Vegetation protection, especially riparian.

"4. Wildlife protection, including fish, amphibians, reptiles, mammals and birds need undisturbed space to maintain viable populations. This is especially true of rare and endangered species requiring specialized habitats.

"5. Cultural. Many additional prehistoric sites could be included with additional acreage.

"6. Wilderness recreation. This represents an area where people, especially the young, can develop a feeling of self-sufficiency and appreciation of the natural character of the land.

"7. Livestock grazing will remain intact.

"8. Mining. In most cases lands so considered have no or little mineralization of economic worth or value.

"The proposed action recommended by the BLM for wilderness designation represents a pitifully low percentage of the total lands involved which are administered

by the Bureau. Of the 1.5 million acres only 34,881 or 2.3% are being recommended. Granted, Aravaipa Canyon will doubtless become wilderness shortly with 6,670 acres. With this, the total would be 2.8%. The total acreage proposed is extremely disappointing when considering the future potential character change of so much land.

"The proposed areas of Needle's Eye, Black Rock, Fishhooks and Happy Camp Canyon are, by themselves, small isolated and irregular pockets or blocks which often do not even follow natural boundaries. Additionally, the Gila Box represents one of the few free-flowing streams which remain available to recreation for rafting and canoeing in the arid regions of Arizona. It could be unique to the BLM Wilderness System.

"For the above-mentioned reasons I submit that additional acreage be included to the proposed four or other potential areas. Also, that a portion of the Gila Box be added to your recommendations.

"As the West continues to expand potential wilderness areas such as these continue to shrink and often disappear completely. It is only through efforts such as wilderness designation that the natural character of the land will remain for future generations."

HEARING OFFICER McHENRY: Thank you very much. Our next speaker is Stu Bengson.

MR. BENGSON: My name is Stu Bengson. I reside at 8900 North Camino de Anza, Tucson, 85704. I'm here representing United 4-Wheel Drive Associations

I had not planned to make an oral presentation tonight, but due to the seemingly one-sidedness of this hearing, I've got a few general comments to make. Someone spoke of the apparent flagrant bias of BLM towards nonwilderness designation. I submit that it's just the opposite. Everywhere throughout this EIS statement they say that wilderness values will not be protected or cannot be protected, or at least they inferred that, without wilderness designation. I submit that there is enough federal legislation regulation and the FLPMA Act itself, which mandates that BLM manage these lands with protection for those resources.

Someone once mentioned that there is less than 3% of the area as wilderness. A study done by the Arizona Mining Association just last year clearly shows that 44% of the state area and 67% of the federal lands now in Arizona are under quasi-wilderness management right now.

Others want to deny ORV ways and ORV users the use, specifically, of the Gila Box. Now, this area in high water times is great for rafting and wilderness pristine enjoyment. At low water times the area is primarily used by ORVers who get the same enjoyment out of the same area. I contend that even though this public pays your salary, so does the other half of the public which seemingly is not here this evening, except for myself. The ORVers pay just as much tax as anybody else.

Another question arises about what about the state and private inholdings in a lot of these areas. Some people have no regard about private property or the state's rights tc manage the lands within the area of those WSAs.

There has been some question about mineral potential and the economic value of the minerals. Speaking for the Mining Association, you can't put minerals where you want them. They are there where you find them. Because these areas have not been explored extensively doesn't mean that there are not minerals there, and just because the minerals today have no economic value on today's market doesn't mean that they won't have value tomorrow when you need them.

T-25

Grazing is allowed in wilderness, true, but what about the management of the grazing allotments. How about putting in improvements? If you find that you can't manage the grazing lease the way it is and need improvements such as water tanks, fences, or other improvements, you cannot go back in there and put these improvements in after the wilderness has been designated. Thank you.

HEARING OFFICER McHENRY: Thank you. Our last speaker, except that if we get a little more time, I think --

Paul, do you still want to speak some more?

MR. HIRT: Yes. About Gila Box Canyon.

HEARING OFFICER McHENRY: Right. Our next speaker will be Roy Emrick.

MR. EMRICK: My name is Roy Emrick and I live at 2220 North Norton, Tucson.

I'm sorry for being late. I didn't hear what some of the beginning speakers said, so at the risk of repeating some comments I, first of all, want to say that I hardly go on the record in support of the nine WSAs proposed. I agree with Bob Coshland in the dismay at seeing what started out with such promise four years ago, they promised us so much, and winding up with so little. So I certainly support reconsideration of many of the areas that were dropped.

One of the arguments that has been used in terms of the mineral potential for excluding areas for wilderness consideration, I think nobody doubts that Congress has the authority to create wilderness areas, and in case of national emergency, to deauthorize wilderness areas. Past policy in creation of wilderness has recognized the fact that they ain't creating any more wilderness these days. Once it's gone, it's gone forever, and so that if one is to make a mistake, it is to make a mistake to the side of possibly including areas that don't quite live up to standard.

There seems to be a complete about-face here on these proposals to eliminate large amounts of area which do meet the standard. I would like to argue for a return to the original policy. The country is no way with its back to the wall in terms of strategic minerals or even basic minerals. Part of the problems with the copper industry today is world overproduction; it's too much, not a lack of it. Also, it seems to me rather foolish at that stage of the game when there is a surplus in the world, to use up our reserves now instead of saving them over against the future when we can't get them somewhere else. I think we're stronger if we have them in the ground instead of using them now, instead of using what's available elsewhere. So I strongly support inclusion of more wilderness. Thank you.

HEARING OFFICER McHENRY: Thank you. That ends the last speaker that signed up this evening. We've got Mr. Paul Hirt who has asked for additional time to speak on Gila Box.

Paul, do I give you five or ten?

MR. HIRT: Yes. Five.

The Gila Box is a particular interest of mine since I have floated and hiked it several times and find it to be of superlative beauty as well as uniquely valuable.

Your recommendation against wilderness is puzzling to me. I can only guess it was a mistake which you will correct in the final EIS. There is probably twice as much public support for the Gila Box as all the other Safford District units combined.

You have had presentations by professionals from the U.S. Fish and Wildlife Service and Game and Fish, as well as your own habitat specialists, all attesting to the outstanding ecological value of the Box. Rafters have pointed out that this is the only natural free-flowing stretch of river in Southern Arizona safely navigable by people of all ages, including the handicapped.

Conservationalists have pointed out how only .003% of Arizona's land mass is considered riparian, and that only .0045% is in a natural free-flowing state. Dams and more dams are planned to wipe out 50% or more of what remains.

A Gila Box wilderness will be a priceless jewel of value not only to the whole State of Arizona, but to the whole Southwest. The National Geographic was so impressed with the Gila Box that they are planning to include it in a forthcoming publication on America's endangered wild places. Guess which managing agency is mostly responsible for this endangerment?

It was brought to my attention that before Secretary Watt decided to revamp the Public Lands Advisory Council, they had recommended wilderness for the Gila Box. Though that recommendation is now considered premature and nonbinding to the new Council, it nevertheless happened.

T-26

I also understand that all through the planning phase the Box was being recommended for wilderness but was dropped at the last minute because of some late figures on ORV use in the area and monitary loss to local economies due to this loss of ORV use in the event of wilderness. I would be embarrassed to try and pull off something like that. Though the actual dollar figure was derived by a BLM economist, the truth is that a 4-wheeler in Safford named Tony Goodwin provided you guys with use and expenditure figures for ORV activity in the Box. You have no figures of your own for use. Additionally, the $75,000 loss figure is completely invalid since the money originates and stays in the local economies and cannot be said to be gained or lost.

Besides, ORV activity will continue on the upper San Francisco, Eagle Creek, and lower Gila, as well as a number of other areas in the District. As you state in your DEIS, quote, realistically, however, ORV use will probably shift to other areas, unquote.

In addition, this ORV use, by your admission, is mostly sand rails, an expensive specialized off-road vehicle holding two people at most, and not the typical 4 x 4 or pickup truck or Jeep that takes a family picnicking. I would venture to say that within the actual wilderness boundary itself, very few families ever go in their 4-wheel drive vehicles to enjoy the scenery. Far more likely is that the use is dominated by a small, loosely-knit group of off-road enthusiasts challenged by the difficulty of navigating the channel in a vehicle. This vocal group of locals, along with your spurious assertion of monetary loss to local economies, are your main reasons for not recommending wilderness. I wonder where your values lie.

Another argument you throw in indirectly is

T-27

how the broadleaf riparian tree-planning project will be slowed down and limited if the ORV group can't get in to help plant as they have said they would. This is misleading, however. First, you explain how the project is scheduled to begin in the spring of '83. That is on page 75, and you also say that you don't expect any actual wilderness designations until 1984; so there is one season already where no conflict would be involved.

In actuality, it will be highly unlikely that Congress will consider any District or State BLM wilderness bills before all the recommendations are completed in 1985.

T-27

There's another season and maybe two more. Forest Service final wilderness recommendations were made in 1979; now, four years later, we are still trying to get a bill. How many years of volunteer labor do you think you're going to get out of these OVRers?

On the other hand, you never asked the Sierra Club or the Southern Arizona Hiking Club or the Audubon or A.W.S.R. whether they would be willing to help with the transplanting project. We can haul as much equipment in a 13-foot raft as a sand rail can -- probably more. I suggest that you find out how much actual OVR volunteer labor you get for the project this spring and see if they will actually make as big a difference as you anticipate.

You state that the tree-planting project can be rewritten to accommodate wilderness. I would agree with that, but I doubt sincerely that the extent of areas to be planted would be greatly reduced, as you suggest.

In any case, if vehicles are as important to the project as you say, then Congress could certainly consider temporary controlled access during certain months in order to facilitate the implementation of the habitat management plan of which the tree-planting project is a part.

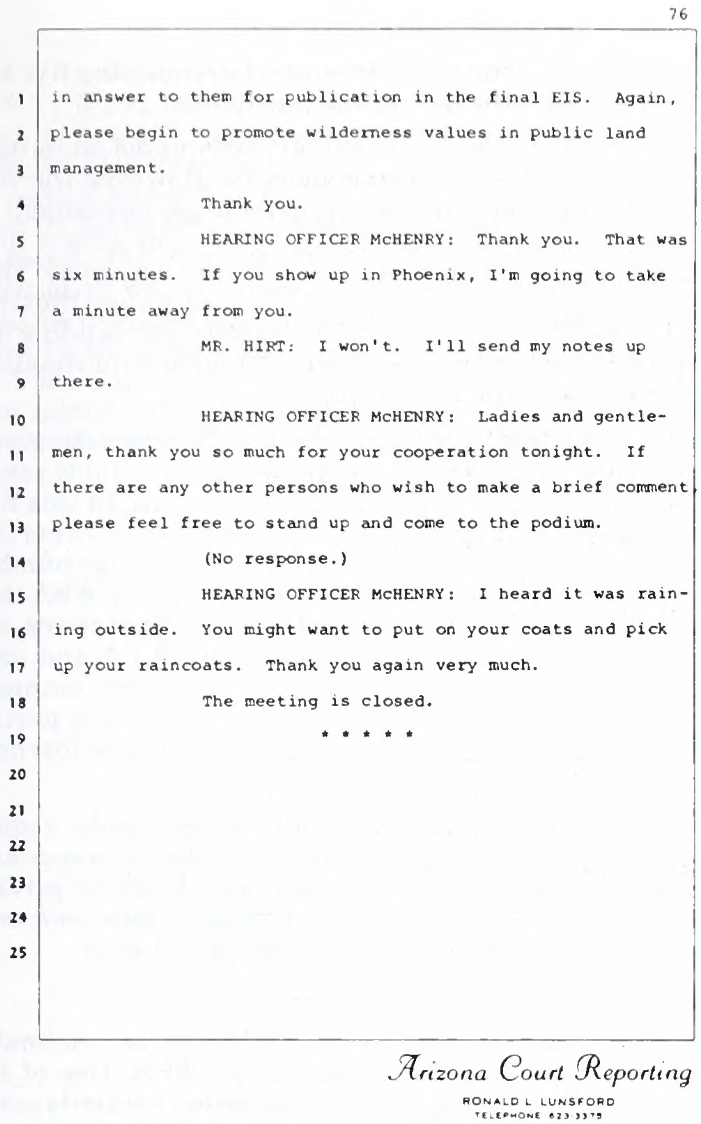
I urge you to recommend wilderness for the Gila Box in your final EIS. Now, ORVs have been mentioned

a lot in this hearing mainly because we are talking wilderness and 4-wheeling is one of the few activities not allowed. We are not out to stamp out ORV use: It is a legitimate and significant recreational activity. There simply are areas which qualify for wilderness designation and where the wilderness resource is more important than off-road activities. We are recommending only about 10% of the BLM lands for wilderness. Surely that is not too excessive an amount of restriction.

If the BLM is anything like the Forest Service in its off-road policy, then probably 60 to 80% of the land is open to ORV use. We need to make a few rational decisions here. Just like everytime a mining company blasts and bulldozes a hillside, all other uses are cancelled out. Wilderness gets the short shrift by the Safford District BLM and the figures prove it. If you spent some time in the next EIS justifying wilderness as the mandated and essential type of land management that it is, maybe you would lessen some of the knee-jerk opposition you get.

Most people still don't understand what wilderness is. They still think it is a lock-up, quote, unquote, or that it isn't a multiple-use. Much of that is your fault for not educating and promoting wilderness.

I urge you to set up a task force to identify erroneous wilderness assumptions and to develop statements



in answer to them for publication in the final EIS. Again, please begin to promote wilderness values in public land management.

Thank you.

HEARING OFFICER McHENRY: Thank you. That was six minutes. If you show up in Phoenix, I'm going to take a minute away from you.

MR. HIRT: I won't. I'll send my notes up there.

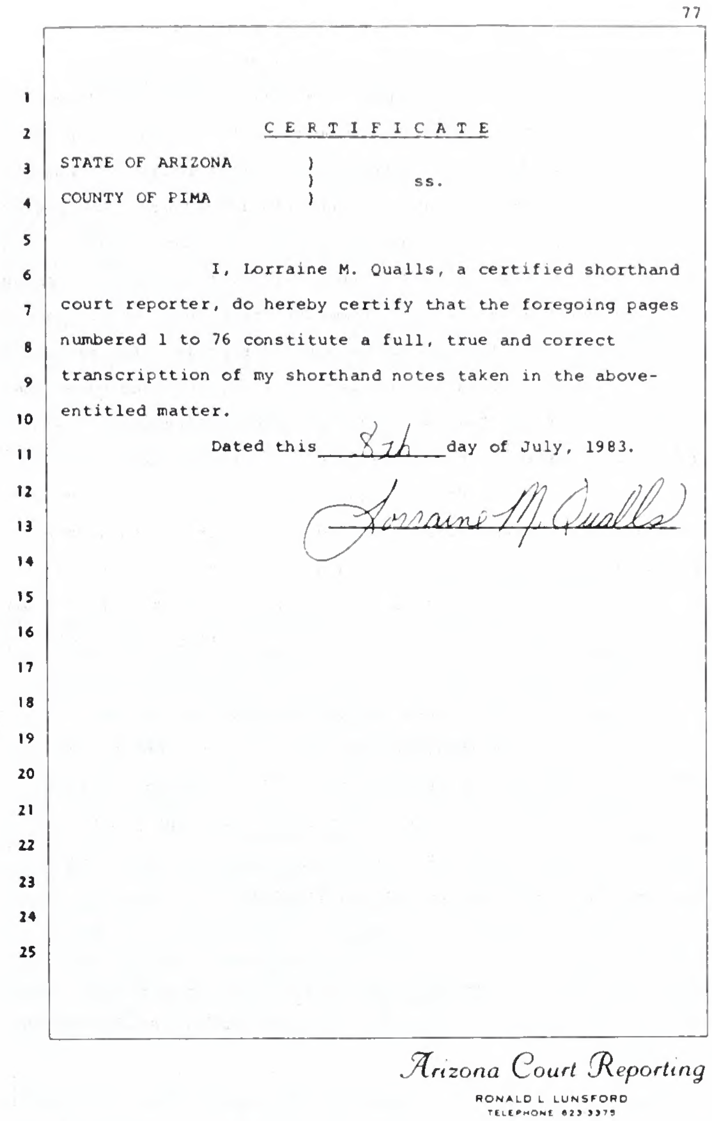
HEARING OFFICER McHENRY: Ladies and gentlemen, thank you so much for your cooperation tonight. If there are any other persons who wish to make a brief comment, please feel free to stand up and come to the podium.

(No response.)

HEARING OFFICER McHENRY: I heard it was raining outside. You might want to put on your coats and pick up your raincoats. Thank you again very much.

The meeting is closed.

* * * * *



CERTIFICATE

STATE OF ARIZONA)
) ss.
COUNTY OF PIMA)

I, Lorraine M. Qualls, a certified shorthand court reporter, do hereby certify that the foregoing pages numbered 1 to 76 constitute a full, true and correct transcripttion of my shorthand notes taken in the above-entitled matter.

Dated this 8th day of July, 1983.

Lorraine M. Qualls

TUCSON PUBLIC HEARING RESPONSES

T-1 See Response 138-1.

T-2 There will be no significant adverse impact to topography, water, climate, air quality, vegetation, fire management or noise for two reasons. First, as you stated, there are no significant increases in other resource uses anticipated. Second, we will manage the multiple uses of the public lands to prevent significant adverse impacts to these resources. There may be very minor impacts to some resources resulting from site-specific or localized changes in resource use. Our responsibility is to provide for environmentally sound use of the public land and their resources.

T-3 See Response 102-10.

T-4 See Response 138-6.

T-5 The rancher in the Turtle Mountain area wants to build a number of facilities to improve livestock management and maximize the resource for livestock grazing. There are conflicts between implementation of the *Turtle Mountain Allotment Management Plan* (AMP) and the wildlife and wilderness resources. The purpose of the wilderness study is to identify these types of conflicts in the development of our recommendations. The grazing-wilderness conflict is not moot because of the grazing-wildlife conflict. All three uses are related in the management of public lands on Turtle Mountain. It may be possible to construct some of the proposed livestock facilities without adverse impact to wildlife in the WSA. However, BLM still has to consider the impacts to the wilderness resource.

T-6 Our view of the naturalness qualities of Turtle Mountain is indeed subjective. However, the district wilderness specialists have been involved with the wilderness inventory and interim management of the WSA for more than five years. In that time they have come to know it well, especially with respect to existing evidence of man and additional projects proposed by the rancher. It is their professional opinion that, cumulatively, the WSA cannot tolerate any more evidence of man's work and still retain the required natural qualities. When comparing Turtle Mountain WSA to Dos Cabezas Mountains WSA you have to assess more than just numbers of improvements that affect naturalness. Type of improvement, including its size and location, must also be evaluated.

T-7 See Response 31-1.

T-8 See Response 138-19.

T-9 See Response 138-21.

T-10 See Response 31-1.

T-11 In 1979 and 1980, BLM intensively inventoried 34 inventory units totalling 311,334 acres. The purpose of the inventory was to determine the presence of the required wilderness characteristics in each inventory unit. In May 1980 BLM proposed that 19 inventory units had the required characteristics and should receive study to determine their suitability for wilderness designation. This proposal was offered to the public for a 90-day review. Based upon those public comments BLM decided 14 areas should receive further study as wilderness study areas. This decision went through a lengthy protest and appeals period and finally it was decided the Safford District would study 14 WSAs totalling 147,150 acres. This document addresses nine of those WSAs while the remaining five are being analyzed in other wilderness studies.

T-12 Public input and comment is evaluated on its content, not where the comment came from. However, the Wilderness Study Policy (BLM 1982c) requires assessment of the adverse or favorable social and economic effects that designation of the area would have on the local areas. This assessment provides a focus on local concerns and the term "local" is defined as the county or counties surrounding the WSAs addressed in this document. For further information see Social Elements, Chapter 3.

T-13 The BLM is required by the National Environmental Policy Act (NEPA) to examine a reasonable range of alternatives in our environmental analysis. In this EIS the range would be from a maximum of *All Wilderness* to a minimum of *No Wilderness*. While there are a large number of possible combinations of alternatives for each WSA that would result in further partial wilderness alternatives, the district has complied with the intent of NEPA and analyzed a full range of alternatives for wilderness management of the nine WSAs. The *Proposed Action* is a partial wilderness alternative that is recommended for wilderness in the Safford District.

T-14 Acquisition of state inholdings would reduce potential impacts on wilderness values due to access and incompatible uses. However, there would still be private inholdings to deal with, low wilderness values, and conflicts with livestock grazing. See Response 138-23.

T-15 See Response T-5.

T-16 At current use levels, ORV use is minimally impacting the natural qualities of the WSA. Use of the dunes results in some damage to vegetation but trails in the sand are not permanent. If use expands to the badlands, the impacts will increase and remain more permanent. Should continued ORV use prove detrimental to the dunes or the WSA, control of the use would be necessary. Also see Response 31-4.

T-17 See Response 31-1.

T-18 The BLM did not recommend wilderness status for Day Mine WSA because it did not feel the wilderness values were so outstanding they demanded designation. This analysis also revealed that the wilderness values would be minimally affected if the area does not become wilderness. Mineral resource value was not a strong reason for the recommendation.

T-19 See Responses 68-1 and 68-2.

T-20 See Responses 102-5 and 138-27.

T-21 The road you refer to was built in 1981 as a continuation of the fluorspar mining operation. Due to conflicts such as this, BLM felt a topographic boundary that eliminated the mine would be a more appropriate boundary to preserve the wilderness values of Black Rock WSA. Management under *All Wilderness* may have to allow further mining that would impact the wilderness resource if valid claims exist and valid existing rights are exercised.

T-22 See Responses 1-2 and 20-1.

T-23 The lands within Eagle Creek Canyon are privately owned.

T-24 See Response 1-2.

T-25 See Response 16-2.

T-26 When the amendment to the management framework plan (MFP) was finished (prior to initiation of this EIS), BLM recommended a partial wilderness alternative be carried forward as the *Proposed Action* for analysis in the EIS. In the MFP amendment obvious ORV use conflicts surfaced. The recommendation for a partial wilderness alternative was an attempt to compromise, lessening the impacts to all resource users. As this alternative was analyzed in the draft EIS it was necessary to acquire more ORV use data. So the District went to the source, the user. This method of data collection is valid. After further, careful consideration in the draft EIS, BLM felt it could better manage the many uses of the Gila Box without forgoing opportunities for ORV use and minerals and energy uses that would be prohibited by wilderness designation. As wilderness, the attributes of the area would be preserved and these uses would be forgone. Without wilderness designation, these uses would be permitted and the wilderness values of the area would also be preserved. This was not a last minute decision based solely on economic impacts attributable to forgone ORV opportunities. Also see Response 101-2.

T-27 See Response 15-1.

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

In the Matter of:)
)
DRAFT ENVIRONMENTAL IMPACT)
STATEMENT)
)
Proposed Wilderness Program)
for the Safford District)
Wilderness EIS Area of Cochise,)
Gila, Graham and Greenlee)
Counties, Arizona and Hidalgo)
County, New Mexico.)

A PUBLIC HEARING

Ballroom, Sections 1 and 2
Hotel Westcourt
Metro Center
Phoenix, Arizona

Thursday, July 21, 1983

Pursuant to Notice and Publication, the above-entitled matter came on for Public Hearing at 7:00 o'clock, p.m.

BEFORE: LAWRENCE McHENRY, Attorney at Law
Office of the Solicitor
United States Department of the Interior
Phoenix, Arizona

APPEARANCES:

On Behalf of the Bureau of Land Management:	
	LESTER K. ROSENKRANCE District Manager, Safford District, BLM
	STEVE KNOX Outdoor Recreation Planner, Safford District, BLM

APPEARANCES: (Continued)

On Behalf of the Bureau of Land Management:	
	PETE ZWANEVELD Outdoor Recreation Planner, Safford District, BLM
	STAN WAGNER Environmental Coordinator, Arizona State Office, BLM
	KEITH PEARSON Sociologist, Arizona State Office, BLM
	JERRY COOLIDGE Community Planner, Safford District, BLM
	KURT KOTTER Gila Resource Area Manager, Safford District, BLM
	LYNN SALINE San Simone Area Manager, Safford District, BLM
	ANDREA NYGVEN Administrative Assistant, Arizona State Office, BLM

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PROCEEDINGS

PRESIDING OFFICIAL LAWRENCE McHENRY: Ladies and gentlemen, this public hearing will now come to order.

First, let me introduce myself. I am Lawrence McHenry, Attorney-Advisor from the Field Solicitor's Office here in Phoenix, Arizona. I have been appointed by the State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of the Interior concerning the wilderness study of the Safford District.

Most of you undoubtedly signed the attendance sheet as you came into the room. If you have not done so, I would like to ask you to sign in now. If you plan to make a statement, be sure to fill out your name on the cards available at the back of the room.

The official Reporter, seated on my right, Charles Emmons, will prepare a verbatim transcript of everything that is said in this hearing, and if you wish to obtain a copy of that transcript, you should make your own arrangements with the Reporter after the meeting.

This public hearing is being held to obtain information relating to nine wilderness study areas, which have been studied by the Bureau of Land Management. A Draft Environmental Impact Statement, EIS, on this subject has been published and is available at the back of the room.

In a moment, I will call on a BLM representative to explain briefly the findings of the wilderness study. The purpose of this hearing centers on two issues:

First, are these wilderness study areas suitable or not suitable for designation as wilderness? Your views and any information you can offer with respect to this question will be greatly appreciated.

Second, is the Draft Environmental Impact Statement adequate? Your comments and suggestions on this subject of the study will also be appreciated.

In arranging for this public hearing, notices were sent out to United States Senators Dennis D. Concini and Barry Goldwater, and to Representatives John McKane, Jim McNulty, Eldon Rudd, Robert Stump and Morris Udall, and to Governor Bruce Babbitt and other elected officials.

Replies which have been received from them will be read later and incorporated into the transcript of this hearing. Notices also have been sent to federal, state and local government agencies and to organizations and individuals known to be interested in the wilderness study.

Now, for a few words about procedure: This hearing is not a debate, a trial, or a question-and-answer situation. It is an advisory hearing, and all interested persons may present statement, either witten or oral, or both, or other information pertinent to the wilderness study we are considering today. There will be no cross-examination from the audience, but if anyone fails to understand a statement of any speaker, you may direct a clarifying question to me, and I will determine whether it is pertinent. This may seem overly formal, but it is intended to give everyone a fair and reasonable opportunity to present his or her views.

When I have finished my opening statement, I will call on a Bureau of Land Management representative to explain the BLM's proposed action. That presentation should take about fifteen minutes. Then, I will call on any elected government official present who wishes to make a statement. Then, after that, we will proceed with other speakers.

Any written statements submitted here will be included in full in the transcript and will be considered on will be considered on the same basis as the oral comments. You may also submit written comments until August 31st, 1983, and these also will be included in the hearing record and considered fully.

Written comments should be addressed to the District Manager, Bureau of Land Management, 425 East Fourth Street, Safford, Arizona, 85546. Again, that's to the District Manager, Bureau of Land Management, 425 East Fourth Street, Safford, Arizona, 85546.

The Federal Land Policy and Management Act of 1976, FLPMA, directed the BLM to conduct a wilderness review of certain public lands. The wilderness study areas under consideration here today were identified by the Bureau under criteria set forth in Section 2(c) of the Wilderness Act. The FLPMA directed the BLM to review such areas and prepare recommendations as to whether the lands are suitable or not suitable for designation as wilderness. The law requires that a public hearing be held as part of the study process. That is what brings us here today.

The Bureau has completed the first part of its wilderness study, and has published a Draft Environmental Impact Statement containing its preliminary findings. Now, it is the public's opportunity to comment on the matter. After the hearing record closes on August 31st, 1983, there will be a thorough review of the Draft EIS. Your comments will be considered by the Bureau's State Director in making his recommendations to the BLM Director in Washington, who must make a recommendation to the Secretary of the Interior.

After due consideration, the Secretary will transmit his recommendations to the President. The President, in turn, will transmit his recommendations to the Congress. After appropriate consideration, which will include hearings, the Congress will accept, reject or modify the President's proposal. Only Congress can designate an area as wilderness and only Congress can release a Bureau wilderness study area from its study status.

As you can see, to my left, the Bureau of Land Management preliminary proposals before you today will undergo comprehensive review and this public hearing and your views are a very important part of that process.

Now, I will call upon Mr. Les Rosenkrnace, District Manager of the Safford District, Bureau of Land Management, to explain the preliminary findings of the wilderness study to you. But first, I would like to explain again that this is not an adversary hearing. If you want to ask a question in order to clarify a certain point, please feel free to do so. Direct your questions to me and I will determine whether they are pertinent. I now turn this over to Les Rosenkrance.

LESTER K. ROSENKRANCE: Thank you. First of all, I would like to welcome everyone here tonight. I appreciate your coming out. I understand tonight was one of the Sierra Club's meetings, and a lot of folks weren't able to make it that otherwise would have been. And we sure appreciate the ones that did make it, everyone that's here.

I would like to introduce some of my staff that are here. If you have any questions about anything that's going on, or about what we've done, or about what we're thinking, or anything like that, feel free to ask them at any time. We'll stick around after the meeting and be available for questions and discuss it with you just as long as you want to stay and discuss the thing.

First of all, here on my left, is Kurt Kotter, the Area Manager for the Gila Resource Area, and on his left is Lynn Saline, the Area Manager for the San Simone Resource Area. Sitting up here in the front is Steve Knox. He's the Team Leader that has conducted the study to this point. Back in the back, we have Jerold Coolidge. He's our Planning and Environmental Coordinator for the District and Andrea Nygven from the Phoenix State Office is here helping us tonight.

One of the things that I would like to make sure that everyone knows is that this hasn't been a short-term thing by any means. As probably a lot of you have heard, we have been working on the wilderness studies in the District for a number of years. In fact, about a little over four years now. We have spent a lot of time looking at the -- each of the sites, each of the areas during all seasons of the year, looked at all the different uses that are going on, what potential uses are, what some of the resource values are, what areas needed more protection or less protection, and so on.

With that, I'll go through just a real brief explanation of what each of the units are, what the sizes of them are, what we're recommending, so everyone's got that clear in their minds -- and where each of them is located. As I talk about each unit, why, Steve Knox will point them out on the map and show you exactly what we're recommending.

First of all, we started off inventorying the entire District and then narrowed it down, as probably everyone's aware of, to the current nine wilderness study areas that we have, that we're talking about here tonight. These nine areas total a hundred and thirty-one thousand, eight hundred and twenty acres, of which we are recommending for inclusion in the wilderness system thirty-four thousand, eight hundred and eighty-one acres.

The first of the units that we'll talk about is called the Needle's Eye. It's located there on the map. The Needle's Eye is composed of nine thousand, four hundred and eighty-five acres. It's located twenty miles south of Globe in the Mescal Mountains. Needle's Eye -- for the Needle's Eye, we recommend that eight thousand, nine hundred and seventy acres be recommended as suitable for wilderness and that five hundred and fifteen acres be recommended as non-suitable. The wilderness designation would protect and preserve wilderness values without significant adverse

impact to other resource values and areas and uses.

Steve just pointed out to me that the overlay shows the total boundary and the light boundary that you see in the background on the map is the total study area. The blue line actually demonstrates the area that we're recommending for wilderness.

The next unit we refer to as Black Rock. It consists of eight thousand, four hundred and ninety-two acres. It's located in the Santa Teresa Mountains, adjacent to the national forest. It's twenty-five miles west of Safford. The proposed action recommends six thousand, five hundred and ninety acres as suitable, and one thousand, nine hundred and two acres as non-suitable. The proposed action, together with contiguous Forest Service RAR-2 area provides thirty-five thousand, six hundred and fifty-two acres of outstanding wilderness lands. Adverse impacts to other resource values and uses are not expected to be significant.

The next unit would be the -- what we refer to as the Fish Hooks unit. It consists of fifteen thousand, thirty-one acres. It's located in the Gila Mountains. It's north of Safford by twenty-five to thirty miles -- northwest of Safford. The proposed action recommends ten thousand, eighty-three acres as suitable and four thousand, nine hundred and thirty acres as non-suitable. Designation would protect and

preserve outstanding wilderness values, including many special features in the wilderness study area. Adverse impacts to other resource values and uses are not expected to be significant.

The next unit is the Day Mine. It consists of sixteen thousand, six hundred and twenty-nine acres and it's located just southeast of the Fish Hooks unit. The proposed action is that there should be no wilderness designation. None of the area was found suitable. Though the WSA contains the basic wilderness characteristics, it is not recommended for wilderness due to lower wilderness values and the presence of similar, but higher, wilderness values in the nearby Fish Hooks wilderness study area.

The next unit is called Turtle Mountain. Turtle Mountain consists of seventeen thousand, four hundred and twenty-two acres. It is also located in the Gila Mountains, twenty miles northeast of Safford. The proposed action does not recommend any of the Turtle Mountain as suitable for wilderness. No lands were recommended for wilderness due to low wilderness values, manageability problems with private and state land in-holdings and resulting conflicts with livestock, minerals and energy resources.

The next unit is the Gila Box, which is just south of the Turtle Mountain unit. These units were separated by a way or a road. The Gila Box consists of seventeen thousand, eight hundred and thirty-one acres. The proposed action does not recommend any of the WSA for wilderness. No lands were recommended for designation because of conflicts between wilderness management and an existing ORV use, and potential energy and mineral uses. The wilderness study area can be managed for its wilderness values without proposing opportunities for the other uses.

The next unit is called Javelina Peak. Javelina Peak consists of seventeen thousand, eight hundred and seventy acres. It's located in the southern end of the Whitlock Mountains. It's twenty miles southeast of Safford. The proposed action does not recommend any of this wilderness study area for wilderness designation. No wilderness designation is proposed for this wilderness study area due to the lower wilderness values and problems with management of the WSA as wilderness.

The next unit is Peloncillo Mountains. The Peloncillo Mountains is on the border between New Mexico and Arizona. It consists of twelve thousand, three hundred and seventeen acres, and it's located about thirty miles southeast of Safford and approximately five miles to ten miles north of Interstate 10. The proposed action does not recommend any of this wilderness study area be designated as wilderness. No wilderness is recommended due to the manageability problems created by highly irregular boundaries. The potential for adverse impacts from incompatible adjacent land uses, though not currently existing, cannot be ignored. Management of this area to preserve its wilderness values in the long-term cannot be guaranteed, even if we designated it as wilderness.

The next unit, the final unit we'll be talking about tonight, is the Happy Camp Canyon. It consists of sixteen thousand, seven hundred and sixty-one acres in the Dos Cabesos Mountains fifteen miles east of Wilcox. The proposed action recommends nine thousand, two hundred and thirty-eight acres as suitable for wilderness, and seven thousand, five hundred and twenty-three acres as non-suitable for wilderness. This proposal will protect the wilderness values of Happy Camp Canyon watershed and eliminate manageability problems associated with irregular boundaries and in-holdings, and it would also eliminate conflicts with known mineralized areas in the western portion of the wilderness study area.

Okay, management of the wilderness areas, the interim management of each of these units, whether we're recommending they be included as wilde-ness or not, will be managed to preserve their wilderness character until Congress acts. Wilderness study areas not designated wilderness will be managed for other multiple uses. Once Congress acts and wilderness management would be passed, the wilderness study areas designated wilderness by Congress will be managed to preserve the wilderness values. Other compatible land uses, such as livestock grazing, hunting and camping will continue in the designated wilderness.

Use of motorized equipment and off-road vehicles normally would not be allowed. Mining and mineral leasing would be prohibited in designated wilderness, except on existing mining claims and leases.

While management of the four wilderness study areas recommended for wilderness will emphasize management of wilderness values, current management of these four areas is not expected to change significantly from the current management.

Where do we go from here? The next thing that will happen is that we will continue to receive comments from the public until close of business August 31st, 1983. At that time, we will completely analyze each of the comments, take a new look at the boundaries, or take a look at each of the units and analyze all the comments. And I will make my final recommendation at that time to the State Director of Arizona for BLM.

We will then prepare a Preliminary File and Environmental Impact Statement and a Wilderness Study Report in fiscal year 1984, which starts October 1st of this year. Those documents will receive State Office, Washington Office and departmental review.

Upon completion of the reviews, the Final Environmental Impact Statement and the Wilderness Study Reports will be printed and distributed to the public. Recommendations on these nine wilderness study areas will be forwarded to the Secretary of the Interior in fiscal year 1985. The Secretary will make his recommendations to the President approximately sometime in 1987. The President will make his recommendation to Congress and eventually, Congress will make the final decision.

I'd like to stress again with all of you that your input is really important in this thing. We've done a lot of work on it and we've spent a lot of time on it, but we really need to -- some fresh perspective, you know, sure don't hurt -- and to have you present, you know, some input. If there's some mistakes made in the Environmental Impact Statement, as it's written, let us know. We're glad to work with any of you to try to get -- make sure the thing is as accurate as possible.

So I would really encourage you to make your recommendations here tonight, and any other time, up to the time that we can -- we have to shut off public comments.

PRESIDING OFFICIAL: Again, let me stress that this is not an adversary proceeding. If you want to ask a question in order to clarify a certain point, please feel free to do so. Please direct that question toward me and if it is pertinent, we'll have someone answer it for you.

I will now begin by calling our first speaker, Gloria Hollingworth.

GLORIA HOLLINGWORTH: Mr. Chairman, members of the board here, I cannot speak for all nine of these wilderness study areas. My particular interest is in the Gila Box. And I just would like to read a couple of sentences that I saw here from your study, concerning the Gila Box. It says, "The perennial Gila and San Francisco Rivers flow for a combined length of eighteen miles through the wilderness study area. The last free-flowing stretch of the Gila River in Arizona is a title given to this portion of the Gila River."

My husband and I, along with other friends, in April of this year, had the marvelous opportunity of rafting down the Gila Box. And it was an absolutely magnificent and rewarding experience. I am much distressed to find that it is not even considered at all to be designated as a wilderness area.

It has a wealth of vegetation, of bird life, of geology, of Indian history -- and to find that perhaps it will all be gone is a very sad and sobering though. I would hope that perhaps you would reconsider, for it is one of the last areas, I feel, which has been unfettered by dams, that it is a free-flowing river. It's a rich and wonderful experience.

It's also one of the last nesting grounds for an endangered species of the black hawk. And I would hope that the Bureau of Land Management might reconsider their designation of this as not a wilderness area.

Thank you.

PRESIDING OFFICIAL: Thank you very much. Our next speaker is Eugene Kinder.

DR. EUGENE KINDER: My name is Dr. Eugene Kinder. I am a resident of Arizona now for four years and I have been a powerful admirer of this great state all of my life.

Now, I had also the good fortune of having the opportunity to take a trip down the Gila River in April with Mrs. Hollingworth, et al, and I want to make some comments about this decision of yours. I do not know the circumstances of your concern of not allowing it to become a wilderness area, but I want to take another point of view.

While I was on this trip, I became aware of the

primitive quality of the area, the aesthetic, the ecological value, the beauty. It was an awsome experience. However, this was interrupted by an experience that happened while we were on this trip. There were five or six young boys on these sand -- these powered scooters, I think they are, and the roar of these things as they came galloping up the side of this little river that we were on. And apparently, this is a -- not an uncommon experience with local people in the area, and I envisioned, as I began to think of the rape of the state of Arizona that seems to be going on, anybody that has a powered vehicle that's four-wheel drive can get into any area that's possible.

These young boys had access to it. Now, they had the right to participate in whatever moved them in their own pleasures. The point I'm trying to make, though, if you do not protect this simple little part of Arizona, this river -- the Gila River, as it flows through this beautiful canyon area -- you're going to open it up to everybody who has gasoline-powered engines, and the next thing we know, there will be a bowling alley down on -- in that area, and a McDonald's Hamburger and whatever.

Now, I may be sounding extravigant and you may take issue, but I think we all must protect as much as we can and any of the circumstances that make it more difficult to

protect these areas must be abolished. What I'm saying is that if you cannot control the grazing, or you cannot control the mining, or you cannot control the hunters, just control the ecological factors.

We saw a black hawk. I don't know if you're acquainted with this beautiful bird. It's a rather endangered species. I saw this beautiful hawk sitting down around this river several times and it was breathtaking for me. Now, maybe I'm the wrong person to be making these comments about the preservation of this area, because I love these things. Most people -- many people could care less. It's you men that have to decide -- or the government, perhaps -- to protect this area.

I'm imploring you to reconsider. I don't know any of these other areas that you're considering. Maybe they have just as much importance to some individuals. But I'm putting in a request, and I'm going to write to our Congressman, who has some responsibility in taking action in this, and I'm going to try my best to have you reconsider this particular Box Canyon area.

Thank you for your time.

PRESIDING OFFICIAL: Thank you, Dr. Kinder. Our next speaker is Tom Wright.

TOM WRIGHT: My name is Tom Wright. I live in

Scottsdale. I've lived in Arizona all my life, and I've been interested in the outdoors a long time. I've not had the pleasure of hiking in the majority of the areas that are considered in this plan. I hope to visit some of them.

I will be submitting a more detailed written statement later on, so I'll be brief here. I support the wilderness proposals for the four units, Needle's Eye, Black Rock, Fish Hooks and Happy Camp Canyon, but I think a mistake has been made in the conspicuous non-inclusion of the Gila Box. I think a wilderness proposal for the Safford District BLM sort of misses the whole point when you leave this area out.

The whole idea of wilderness is to protect and conserve outstanding scenic, natural and recreational areas, and the Gila Box has all those ingredients and more. It's a free-flowing river through a desert environment, something that is very rare. It has recreational opportunity that is not matched anywhere else in Southern Arizona. It has an abundance of wildlife. I would like to see it included in the plan.

As I said, I will have more to say in a written statement later on. Thank you.

PRESIDING OFFICIAL: Thank you. Our next speaker is Bob Witzman.

BOB WITZMAN: My name is Bob Witzman. I'm a past president of the Maricopa Audubon Society.

On behalf of the fifteen hundred members of the Maricopa Audubon Society who reside here in Central Arizona, and with the support and encouragement of the other forty-five hundred members throughout this state, I wish to strongly encourage the all-wilderness classification of the Gila Box.

One would be hard-pressed to find any other desert riparian area to match the Gila Box in this state. The ecologic diversity leant by the Sonoran and Chihuahuan desert scrub vegetative communities which interface in this area makes this area one of the great natural areas of the Southwest. Not only is it a living museum and a classroom for its environmental attributes, but it is unquestionably worthy and eligible for wilderness designation. It is roadless, habitationless and undisturbed because of its remoteness and inaccessible -- inaccessibility to ordinary vehicles.

To try to compare this area to the other desert streams managed by the Bureau of Land Management in this state would be missing the mark, since every stream system has unique attributes.

But to name a few others -- a few other river systems, such as the San Pedro, the Santa Cruz, the

Middle Gila and the Lower Gila, it should be noted that they are heavily disturbed and not candidates for wilderness. The Big Sandy and the Santa Maria and the Bill Williams in the western part of the state have similar pitfalls and they have less ecological diversity and certainly more aridity. Only the tiny Burro Creek gem remains to match your BLM Gila Box riparian crown of jewels.

On the Forest Service lands in the state, the Verde and the Salt Rivers are the only other desert gems to match yours. We hope you will treat the Gila Box with the reverence, dignity and protection which it unquestionably deserves.

P-1

To say that off-road vehicles are a use which should preclude wilderness classification for this natural heritage treasure trove is unthinkable. It is difficult for us to imagine that off-road-vehicle use would be protected and encouraged here when there are so very, very few prime desert riparian areas remaining in the Southwest.

It should be well known to the BLM that almost all of the major water courses of this state have been dammed, diverted, dried up or channeled to extinction at the lower altitudes. It's true, there are streams at the higher altitudes, but not here in the lower altitudes -- in the lower ecosystems.

Why must you set aside one of the most unique of these few remaining stretches of a now-almost-extinct ecosystem to be the dusty, noisy, land-scarred playground of the off-road vehicle. You know very well and have stated very well the unique avafaunal diversity of this area, with its state or federally endangered wildlife -- for example, the black hawk and the zone-tailed hawk. But with its also present golden eagle, Cooper's hawk, prairie falcon and red-tailed hawk populations, it easily surpasses in diversity that much-aclaimed BLM revuge, the Snake River birds-of-prey area.

I've been living in this state since 1958. I've been looking at its wildlife and its ecosystems, at its riverbottoms in the desert continually, since I arrived in the state. I don't know where you can match a place like the Gila Box. It has water in the desert. It has the wildlife densities present there, and at the same time, wilderness attributes and exceeding scenic value.

Burro Creek is a little gem, but it is so small that it doesn't really have quite the wilderness size and has been excluded by your decision. Here is really your finest shot for this type of a habitat and I hope that you will very seriously consider it.

I would like to make a few comments about the grazing that has gone on in this area. Though it's been heavy, I don't feel that it's precluded its wilderness designation. Grazing has occurred on ever river in this state very heavily. The chance for riparian revegetation of hardwoods is exceedingly limited because of this grazing, but I'm not faulting you as land managers. I'm not -- and the Society is not faulting the livestock grazers. This is historical. We would fault you if nothing was done to correct this situation. But both you and the cattlemen have shown an equal concern for this problem. They respect the wildlife on their ranches just as much as you desire to be good custodians and stewards of the lands that you have jurisdiction upon.

I have talked many times with BLM officials and I know that they have done studies which have shown what off-river pastures can do, what rotation can do, what fencing can do, what off-water water developments can do. The Gila River does lack a great many trees, now, and this does not mean that it can't, in fact, be an exceedingly valuable resource.

The Bonito Creek and the San Francisco Creek and the adjacent tributaries in the area all show you what can occur when grazing is reasonably managed, and I'm looking forward to a time when this area will have a greater carrying capacity, but what I wish to say is that even though heavily grazed now that should in no way say that we can't improve upon it and bring it back to a lot of its original values.

Returning, then, to the subject of the all-wilderness classification, I would just like your serious consideration of this option, please.

PRESIDING OFFICIAL: Our next speaker is Susan Ahearn.

SUSAN AHEARN: My name is Susan Ahearn and I have lived in Arizona for fifteen years.

PRESIDING OFFICIAL: Excuse me. I failed to do something. Would the speakers please give us your addresses, too?

SUSAN AHEARN: Okay. I live at 5603 North Calle Del Santo in Phoenix.

In the past, and continuing into the present, Arizona's waterways have been dammed, diverted and pumped dry. What segments of these rivers that remain unaltered by man are precious few.

In the proposed Gila Box wilderness, such a condition does exist. Two perennial rivers, the Gila and the San Francisco, flow unimpeded through desert canyons, providing life along their banks to a unique variety of plants and animals. The area also provides solitude and peace in a highly scenic area, as well as providing recreation in the form of river running, hiking, backpacking, birdwatching and photography, to name a few.

We owe it to ourselves and future generations to protect this unique area of Arizona's natural heritage before such areas vanish at the hands of man. It is for this reason I favor the wilderness protection for the seventeen thousand-plus acres of the Gila Box area.

Thank you.

PRESIDING OFFICIAL: The first four speakers, after the meeting -- or the hearing is closed, would you please leave your addresses at the back, at the table. Again, if you are representing an organization or a club and wish to state that, please do so.

Our next speaker is Janet Witzman.

JANET WITZMAN: My name is Janet Witzman. I live at 4619 East Arcadia Lane in Phoenix.

I've lived in Arizona and in Phoenix for twenty-five years, and I live in the largest city in this state -- not by choice, but my husband's job is here -- but by choice, what I like to do whenever I get a chance is go to the beautiful scenic areas of this state, and I'm particularly interested in plants and birds and butterflies that inhabit these areas. And I'm interested in them -- I like to study which ones occur in which areas. In other words, different ones occur in some elevations. Different ones occur in the Sonoran Desert. Different ones occur in the Chihuahuan Desert. And for me, the study of these interactions of the plants and the birds and the butterflies is a great joy to me, and I especially enjoy studying and learning about these things and the solitude that goes with it, and I can really -- it's really unpleasant when I'm out in an area, to be disturbed by and have the wildlife that I'm studying be disturbed by noises of off-road vehicles and I feel that the -- I'm asking you to preserve the Gila Box in a wilderness state. I feel that it's one of the few areas in Arizona. Perhaps the Verde and the Gila are the only two rivers that flow in a desert that are suitable for wilderness, and are still not inhabited, or haven't been damed.

The Gila Box is the only one where we have the Chiahuahuan Desert and the Sonoran Desert meet. And especially, I know that the local people like to use that area, but I feel that in the Safford area, in the Gila Box area, there are so many places where people can go and the off-road vehicles can enjoy the area.

The people in the cities, like Tucson and Phoenix, really need places like this that they can go to, and they don't have as many places. And I would just like to -- I went through the Gila Box this spring and I thought it was one of the most beautiful areas I have ever been in and I would like to ask you to keep it in wilderness.

And I thank you for having this hearing in Phoenix so we could talk to you about it. Thank you.

PRESIDING OFFICIAL: Thank you. Our next speaker is John Ricker.

JOHN RICKER: My name is John Ricker. I live at -- or my office is at 2610 North 3rd Street, Phoenix. I am a practicing physician for forty-three years in Phoenix. I do not represent any organization. I'm representing myself. I'm a founder-member of the Arizona Chapter -- Grand Canyon Chapter of the Sierra Club, a former National Director of the Sierra Club, National Outings Committee Chairman and presently running the outings program in the Southwest for the Sierra Club. I give you this background to let you know that I'm very interested in the out-of-doors and I've hiked and run rivers in practically all of canyons and rivers in the state of Arizona.

I really did not know that the Gila Box existed until this spring. I had the opportunity to raft down it in relatively high water. I've rafted and kayaked the Salt River about fifty times. I find that the Gila Box is a delightful place. It is so different from the Salt. It is a spectacular primitive area for its twelve or fifteen miles,

and it is gentle. It is easy. It is not dangerous. The Salt River can be dangerous. It's risky and part of the year, it's not runable, even though there's water in it.

Also, the Gila Box, during the late spring, summer and early fall, is suitable for hiking. This is one of the few river canyons that we really can hike in where there's water. Most of the river canyons dry up in the summertime, so when hiking, you would have to carry your own water, whereas in the Gila Box, you can walk through it and have water for bathing, cooking, drinking, if you purify it. I think that is quite important.

P-2

The off-road vehicles, they can carry their own water. They do, I think, a lot of destruction when they run up a riverbottom, especially, when we have so few of them in Arizona.

I should like to request -- urge you to set aside the entire seventeen thousand-plus acres as wilderness. Thank you.

PRESIDING OFFICIAL: Thank you. Our next speaker is Mary Cosaboom.

MARY COSABOOM: Good evening. I'm Mary Cosaboom. I live in Tempe, Arizona. With reference to the Safford District Draft Environmental Wilderness Evaluation, I wish to extend my thanks to the Bureau of Land Management for, first,

recognizing rare, endangered and threatened species of flora and fauna in specific areas -- the nine areas that you have been addressing in this report.

I also wish to thank the BLM for their plans for regeneration of broad leaf riparian plants along selected riparian zones where cattle have destroyed the new riparian growths each year for years and years and years.

And I also thank you for selecting and recommending areas for wilderness status which add to the vegetative diversity of units within the national wilderness preservation system. I thought that was very nice to read about in this Impact Statement.

While I intend to submit a written report covering in greater detail the Draft Impact Statement on the Safford District, I will this evening reserve my comments to several issues of primary importance to me at this time.

P-3

I would like the Bureau to not conform to the usual format for bureaucracies in placing great weight on the geographic distribution of wilderness areas. After all, the distribution could not be important, could it, if there was no wild land left in the entire rest of Arizona, and yet, we had some few jewels clustered in a rather small area? We would definitely want to preserve those few clustered jewels, would we not?

I'm afraid, with the rapidly vanishing natural resources in Arizona, that we must go on this premise: That we must preserve all while we still can.

I'm extremely pleased that the BLM seemed to recognize the value of riparian areas in its Draft Statement. I thank the BLM for this also, and I find it odd with their emphasis on the richness of diversity of life in our ever-rarer Arizona riparian zones, that the Gila Box was not recommended for wilderness.

Indeed, more description of the quality of this riparian area was included in the Statement, more than for any of the other riparian areas. Yet, still this curse of no wilderness.

Special mention was made in reference to the Gila Box to the invasion of ORVs in a small corner of this area, and that was the main reason for rejection of this unit as wilderness. Frankly, I say "Bah, humbug" to this. Off-road vehicles can ramrod anywhere and elsewhere, if they wish, but not in wilderness areas, and not in areas which classify as wilderness areas, in my opinion.

Only two percent of Arizona ever was riparian, and it has been continuously severely reduced for the last fifty years by multiple huge systems of dams. These dams have ruined, severely altered and damaged natural riparian zones with features unique to Arizona. This destruction must be stopped now. There is not one reason why the public should give even one more inch of riparian zone, let alone miles, to dams, ORVs, or other destroyers, since those elements have taken the lion's share of water courses.

I have walked in riparian zones which have not had the disturbance of ORVs, and I sympathize with the other speakers of this evening who have talked about the three-wheeled monsters which have roared upon them. I've had two-wheeled monsters, bright yellow, bright yellow and black jacketed and panted individuals roaring up streams. The streams have fern bottoms with their little snails and little fishes and the beautiful snakes, all in the water, and after those vehicles, the water was coated in oil and those little creatures were gone.

We have stood, my friends and I, by the stream and watched and waited to see how long it would take nature to just dare to creep back into these natural areas after someone had roared through with an oil-gasoline powered vehicle. And it sometimes took thirty minutes. Sometimes, it took an entire day. I think that's sad.

And worst of all, when we would be walking on the bottoms of these water courses ourselves in our soft little sneakers, we found the bottoms of those streams to be

extremely firm until we stepped into the track of one of these vehicles, and at that time, we sank to our ankles in the soft gravel. Snails were smashed. There was nothing left there but mush. I think it is extremely destructive.

The Draft Statement has mentioned that riparian zones exist in the following units: Needle's Eye, Black Rock, Fish Hooks, Day Mine, Gila Box, Turtle Mountain and Happy Camp Canyon. Of these, Needle's Eye, Fish Hooks, Day Mine, Gila Box and Turtle Mountain are all nesting sites for rapters (phonetic). In addition, the desert bighorn has moved into Turtle Mountain. None of these species can be moved out of their increasingly small environments. That's my opinion.

Man must be the protector of these lands, or lose them for himself, as well as all of God's other creatures. Happily, of the nine units under review in this Statement, seven have riparian zones in them. Of those seven, four are recommended wilderness areas and even parts of these areas have been snipped away with the bureaucratic shears. The four included are Needle's Eye, Black Rock, Fish Hooks and Happy Camp Canyon. The three not included for recommendation, which have riparian zones, are Day Mine, Gila Box and Turtle Mountain. I urge the BLM to reconsider its eliminating any riparian zones from wilderness consideration for any reason,

and most particularly, in favoring ORV invasion, more than any other unit, the Gila Box unit deserves star status as a wilderness candidate in this cluster of jewels.

Let me give you some of your own words, which I have extracted from your Impact Statement: In the words of the Statement, for instance, on page 29, you have said, "The area" -- and I'm referring to Gila Box -- "The area's running water, rugged and colorful terrain, highly eroded geologic formations and diversity of plants and animals produce outstanding scenery." A page later, you say, "Opportunities for solitude are outstanding throughout most of the wilderness study area. The rugged topography with its numerous canyons offers many opportunities for isolation and solitude, which are enhanced by the area's large size and natural condition."

Also, it's mentioned that this area offers an outstanding variety of primitive recreation uses. Further quoting, "The river's canyons, plants and animals all combine to provide outstanding hiking, backpacking, seasonal float boating and canoeing, camping, photography and sight-seeing." Continuing the quote, "It also offers good opportunities for hunting, fishing, rock climbing, horseback riding and bird watching."

Gentlemen, what more could you ask of a wilderness

area? The size of the unit, the last-of-its-kind status, the total richness included in this area of Gila Box truly meets the wilderness criteria, as you yourselves state. The unit goes far beyond the basic criteria for wilderness, and in this state of desert and sand, we must preserve every undisturbed stretch of our rivers.

A point equally important to me in reference to water is the proposed dams for any of the water courses in this Safford District area. In the first place, evaporation from these dammed waters drastically reduces water available to the land. Secondly, wildlife that is undisturbed by man is best left that way, and in no way are going to benefit by damming a flowing water supply.

And farmers in floodplains don't belong in floodplains, and the public should not pay for a dam to protect people so naive, or stupid, to develop land within a floodplain.

In closing, I thank the BLM for their consideration of riparian zones, and I wish them to include every riparian zone unit into wilderness recommendations, most specifically the Gila Box having primary importance. Thank you.

PRESIDING OFFICIAL: Thank you. Our next speaker is Joe Willy.

JOE WILLY: Thank you. My name is Joe Willy. I live at 4529 East Redfield Road in Phoenix, and I've been a resident of Arizona for approximately six years, now, and I do quite a bit of hiking and some rafting. I'm here simply to join the speakers who have urged that you reconsider your decision with regard to the Gila Box.

Thank you.

PRESIDING OFFICIAL: The next speaker is James Fitzsimons.

JAMES FITZSIMONS: My name is James Fitzsimons and my address is 417 East Cornell Drive in Tempe, and I have lived in Arizona for forty-two years, and I've seen lots of the unnecessary structures built -- dams, especially, around here.

I'd rather not see -- lose another area to any kind of development, and so I'm speaking in favor of keeping the Gila Box as a wilderness area.

Thank you.

PRESIDING OFFICIAL: If anyone else wishes to speak, please sign a card in the back. We have one last speaker registered. Beth Medrano.

BETH MEDRANO: My name is Beth Medrano. I live at 5121 North 13th Avenue. I'm the Conservation Chairman for the Grand Canyon Chapter of the Sierra Club. The club has already gone on record, I believe, last night in Tucson, as

having a stance on almost every one of these areas that are being considered for wilderness, and we don't intend to repeat it again. We would like to stress our wholehearted support up here in Phoenix for the Gila Box.

I'd also like to go on record to thank the Safford District. Their staff has been most cooperative whenever I've had a question, and the very fact that they came all this way to hold a hearing is unique, and I think it shows a sensitivity on their part to the fact that people, in their recreation, are spreading out and covering all over -- covering the state. The metropolitan area of Phoenix does go off to all the four corners of the state of Arizona on the weekend, and the BLM has shown a sensitivity to that fact by bringing the hearing up here.

P-4

I do have a concern, though, and I don't know quite how it can be addressed. I know that this is not a question and answer session, but I believe that the Draft Environmental Impact Statement definitely conveys the idea that ORV use was the conflict that was primary in your mind when you made your no-wilderness designation. And yet, in informal conversations with BLM's staff, I have got the impression that minerals is as great a problem, and possibly when the Final EIS comes out, that will be clarified. But that will be clarified too late for the people that you've

heard here tonight, who might have been able to address that in their written comments had they realized that. And I just wonder if there's any way here tonight that we can hear from the Safford District on that point, because people have been talking about the values -- the personal values -- that are found there in that river canyon, and I think they would have divided their attention evenly between that and minerals, if they had any clue from your Draft Statement that that might have been the decisive factor.

So I would just like to ask if there's any way that we can possibly clarify that. Thank you.

PRESIDING OFFICIAL: Thank you. Are there any other persons who wish to speak tonight?

(No response)

PRESIDING OFFICIAL: I've been instructed by the District Manager for the Safford District, Mr. Les Rosenkrance, that because of the early ending of the speakers' presentations here this evening, that the Safford District people will leave themselves open for questions. However, this will be off the record. Is that okay with you.

(No response)

PRESIDING OFFICIAL: Okay. I will now close this particular meeting and you may now air your questions.

(Whereupon, the hearing in the above-entitled matter was closed.)

CERTIFICATE

THIS IS TO CERTIFY THAT the foregoing proceeding in the matter of the Draft Environmental Statement, Safford District Proposed Wilderness Area Program was held as herein appears, and;

THAT the foregoing pages 1 through 39 are a true and correct transcript of tape recordings taken and monitored by myself at the time and place hereinbefore written.

Charles Emmons
CHARLES EMMONS & ASSOCIATES
3920 East Indian School Road
Phoenix, Arizona
GSA Contract Reporters

PHOENIX PUBLIC HEARING RESPONSES

P-1 See Response 1-2.

P-2 See Response 1-2.

P-3 The Wilderness Study Policy (BLM 1982c) requires that the geographic distribution of wilderness be considered in the assessment of wilderness suitability for each of the WSAs. The policy further states that this factor will not be used as the sole basis for determining whether an area is recommended suitable for wilderness designation. This is just one of many factors that must be considered in the study.

P-4 The decision not to recommend Gila Box WSA for wilderness designation was made because wilderness management would conflict with existing ORV uses and potential mineral and geothermal energy uses. Nonwilderness would allow better management of all resources than would wilderness management, while still protecting the natural values and opportunities for solitude and primitive recreation.

SAFFORD DISTRICT WILDERNESS EIS
STATUS AND ALTERNATIVE MAPS

LEGEND

WSA	▬
PUBLIC	☐
STATE	▨
PRIVATE	▤
INDIAN RESERVATION	▒
NON-FEDERAL MINERALS (within WSA)	▧

Vehicular Access Features

- PRIMITIVE TO UNIMPROVED
- GRADED AND DRAINED
- GRAVEL
- PAVED: LOW TYPE
- PAVED: HIGH TYPE
- FREEWAY
- FAP 13 FEDERAL-AID PRIMARY
- 481 FEDERAL-AID SECONDARY
- 5310 FEDERAL-AID URBAN
- 17 66 89 37 HIGHWAY ROUTE MARKER
- HIGHWAY INTERCHANGE
- MILEAGE BETWEEN POINTS ★ 7 2 ★
- MP 320 MILEPOST
- RAILROAD AND STATION
- GRADE SEPARATIONS
- HIGHWAY TUNNEL
- HIGHWAY BRIDGE

Development and Topographic Features

- AIRSTRIP
- COMMERCIAL AIRPORT
- MUNICIPAL AIRPORT
- MILITARY AIRFIELD
- HELIPORT
- INTERMITTENT STREAM
- NARROW STREAM (LIVE)
- WIDE STREAM WITH DOCK OR BOAT LANDING
- LAKE, RESERVOIR OR POND WITH DAM
- SPRING
- TAILINGS POND
- DIKE OR LEVEE
- NATIONAL BOUNDARY
- STATE BOUNDARY
- COUNTY BOUNDARY
- G GAS LINE

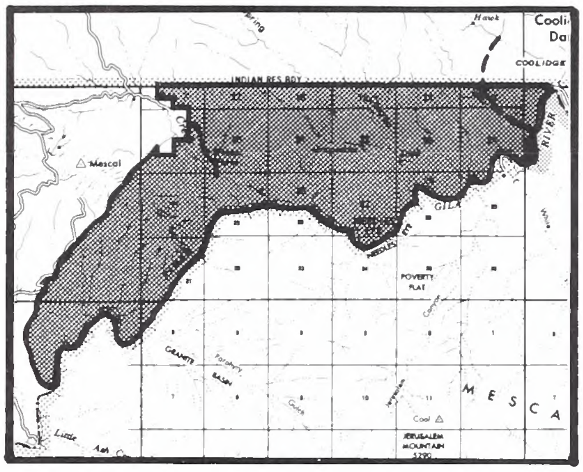
Basemap © New Mexico State Highway Department

- T TRANSMISSION LINE
- UNDERGROUND COAXIAL CABLE
- NATIONAL FOREST BOUNDARY
- PARK OR RESERVATION BOUNDARY
- RANCH OR FARM
- DWELLING OR DWELLINGS
- TENANT HOUSES
- SEASONAL DWELLING OR DWELLINGS
- TRAILER PARK
- CEMETERY
- HOSPITAL OR FIRST AID STATION
- SCHOOL
- CHURCH
- PAROCHIAL SCHOOL
- GOVERNMENT BUILDING
- COURTHOUSE
- LIBRARY
- LAW ENFORCEMENT OFFICE
- FIRE STATION
- TOWN HALL OR COMMUNITY HALL
- CORRECTIONAL INSTITUTION
- POST OFFICE
- BUSINESS, OR TRADING POST
- COMMUNICATION TOWER
- WELL
- WINDMILL
- WATER RETARDING OR DIVERSION STRUCTURE
- WATER TANK
- FACTORY OR INDUSTRIAL PLANT
- MINE OR PROSPECT
- POWER PLANT
- TRANSFORMER STATION
- WAREHOUSE
- STOCKYARD OR CORRAL
- GRAVEL PIT
- DUMP—GARBAGE, RUBBISH AND OTHER
- JUNKYARD—AUTO, SCRAP METAL
- SEWAGE DISPOSAL PLANT
- STATE OR COUNTY HIGHWAY MAINTENANCE YARD
- PICNIC GROUND
- CAMPSITE
- BALL FIELD
- ROADSIDE REST
- SP SMALL PARK
- C GOLF COURSE OR COUNTRY CLUB
- A AMUSEMENT PARK OR RODEO GROUNDS
- OBSERVATION OR LOOKOUT TOWER
- INDIAN RUIN
- SMALL MONUMENT, RESERVATION, OR POINT OF INTEREST
- ◉ COUNTY SEAT
- ○ OTHER CITIES AND POPULATED PLACES
- INCORPORATED CITY
- CONGESTED AREA, CULTURE NOT SHOWN

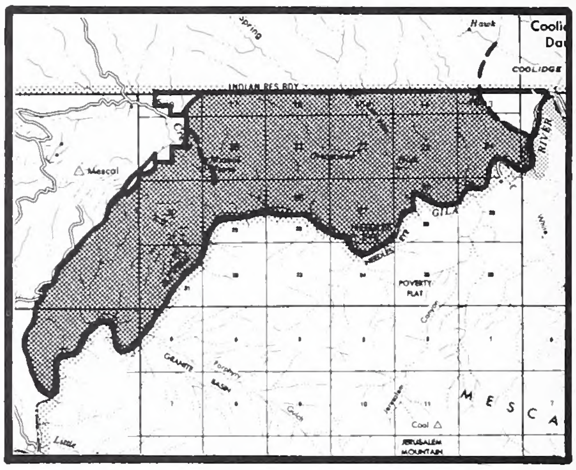
Land Survey Information

- TOWNSHIP OR RANGE LINE
- SECTION LINE
- Sage TRIANGULATION STATION (WITH NAME)

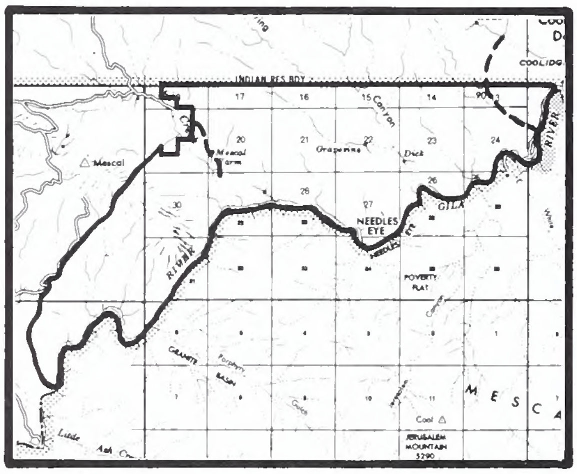
Basemap © Arizona Department of Transportation



ALL WILDERNESS and ENHANCED WILDERNESS



MODERATE WILDERNESS and PROPOSED ACTION



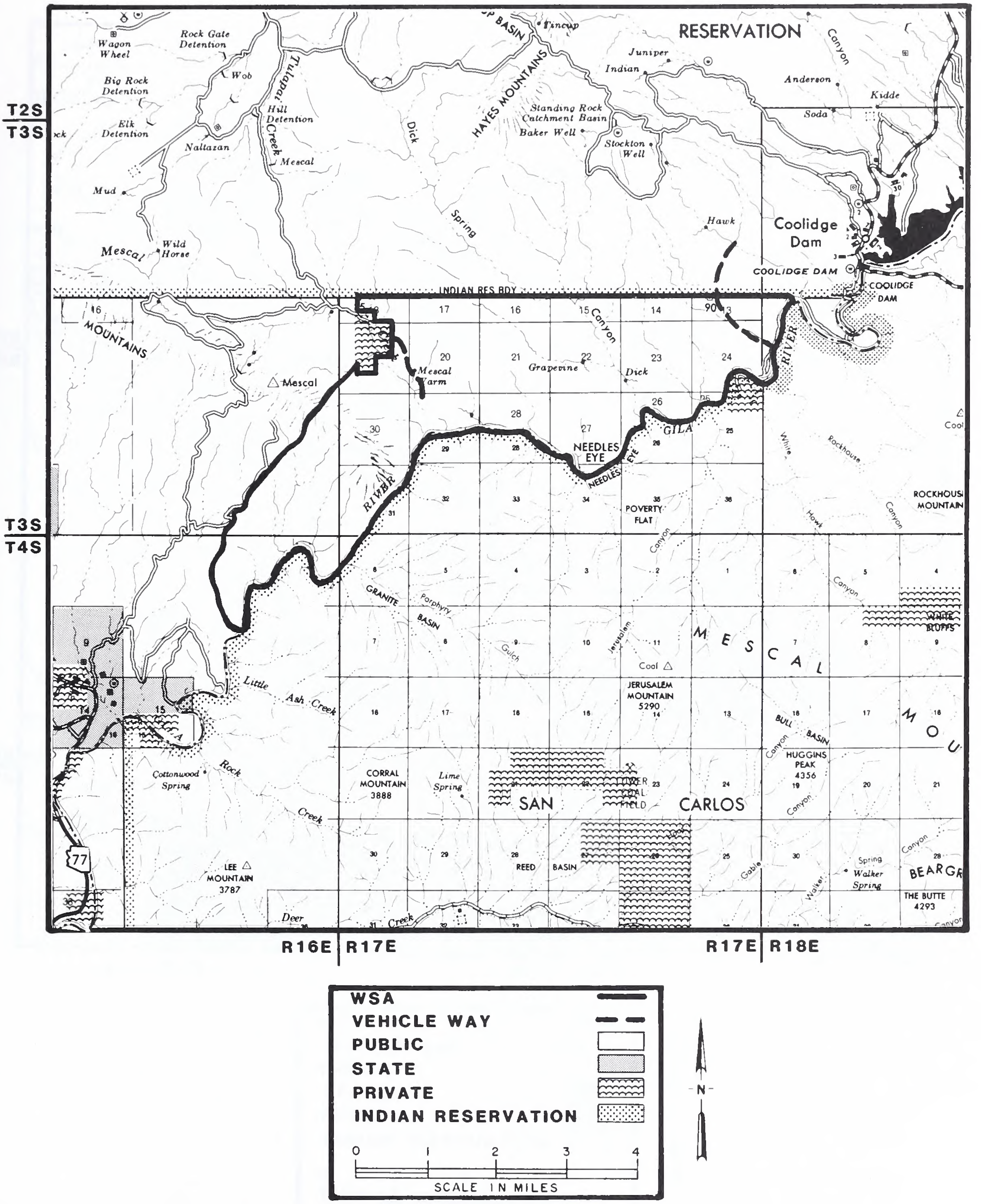
NO WILDERNESS

WSA BOUNDARY	━━
AREA PROPOSED FOR WILDERNESS DESIGNATION	▨

NEEDLE'S EYE 4-1A

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management–Safford District
MAY 1986

BASEMAP © ADOT



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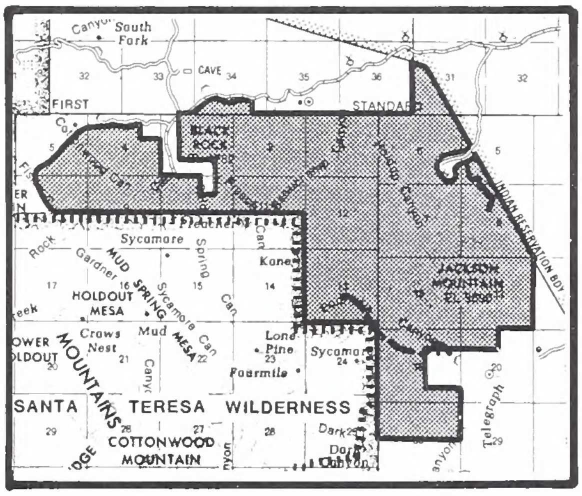

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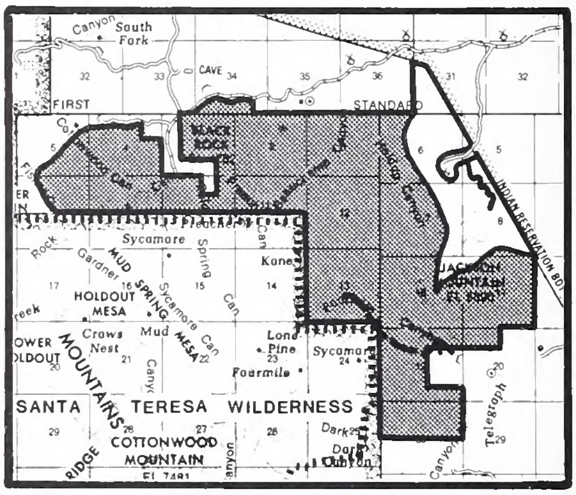
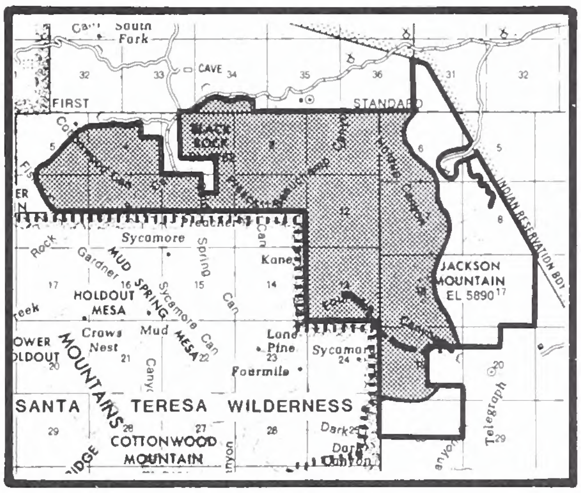
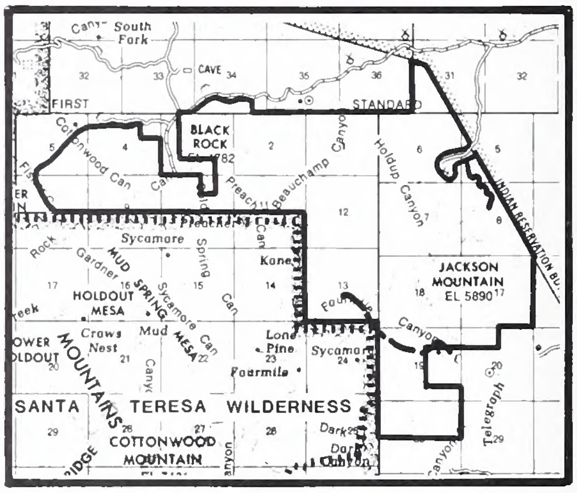


ENHANCED WILDERNESS



MODERATE WILDERNESS and PROPOSED ACTION



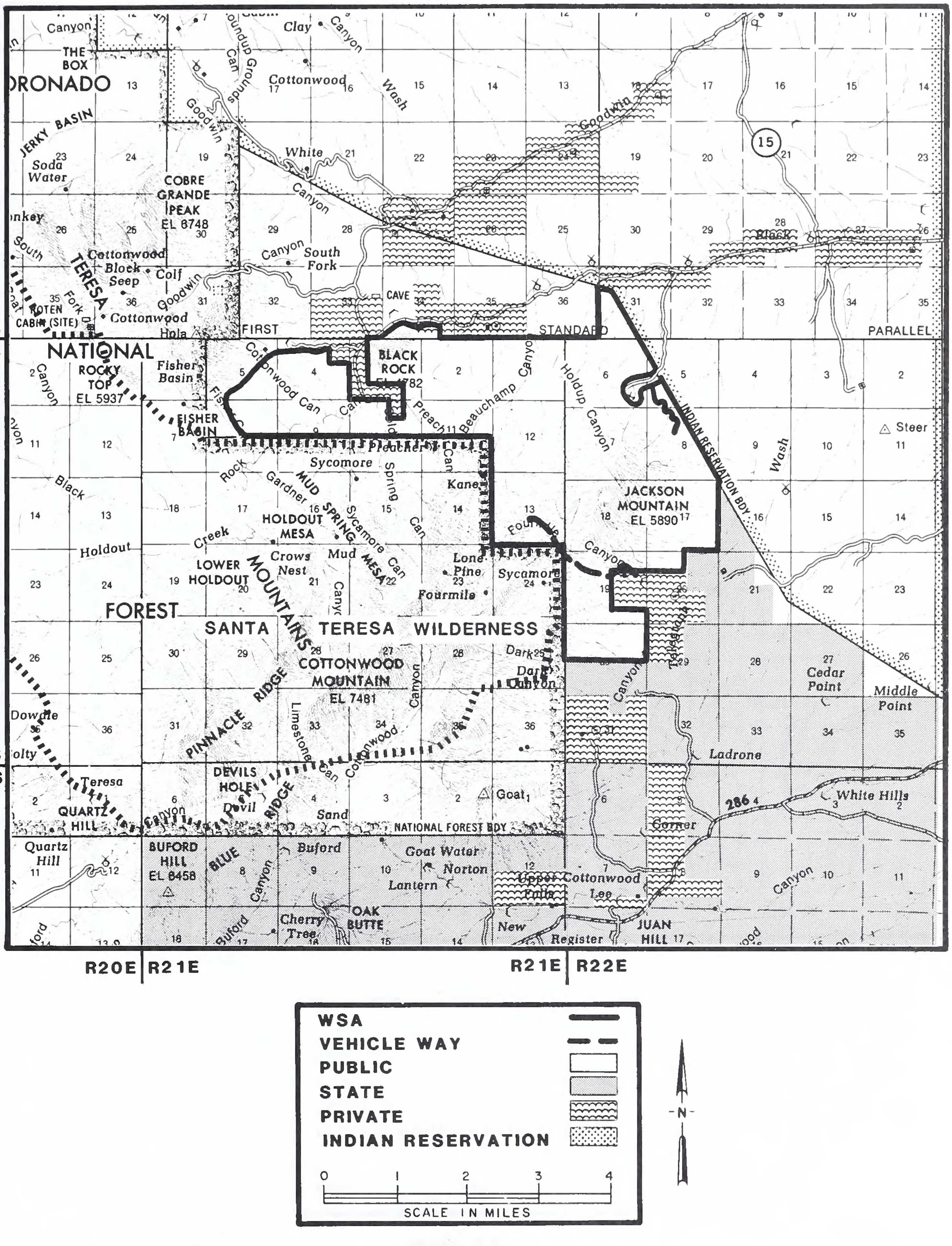
NO WILDERNESS

WSA BOUNDARY —

AREA PROPOSED FOR WILDERNESS DESIGNATION ▨

BLACK ROCK 4-8

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management–Safford District
MAY 1986
BASEMAP © ADOT



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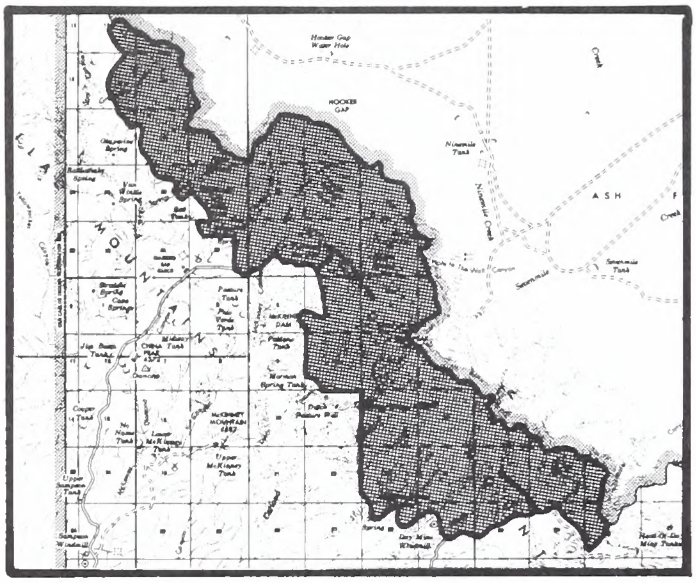
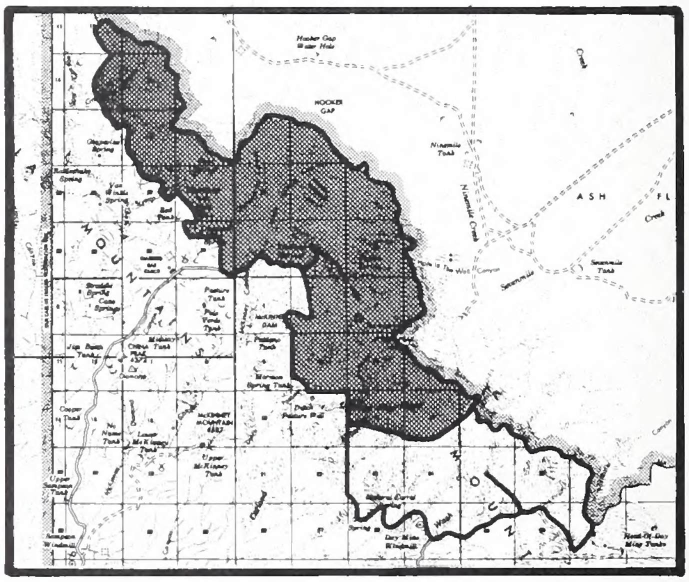
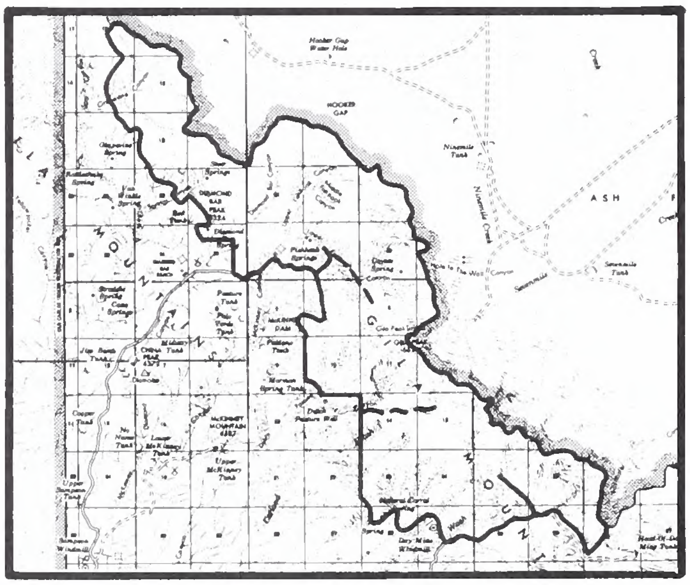


ALL WILDERNESS and ENHANCED WILDERNESS



MODERATE WILDERNESS and PROPOSED ACTION

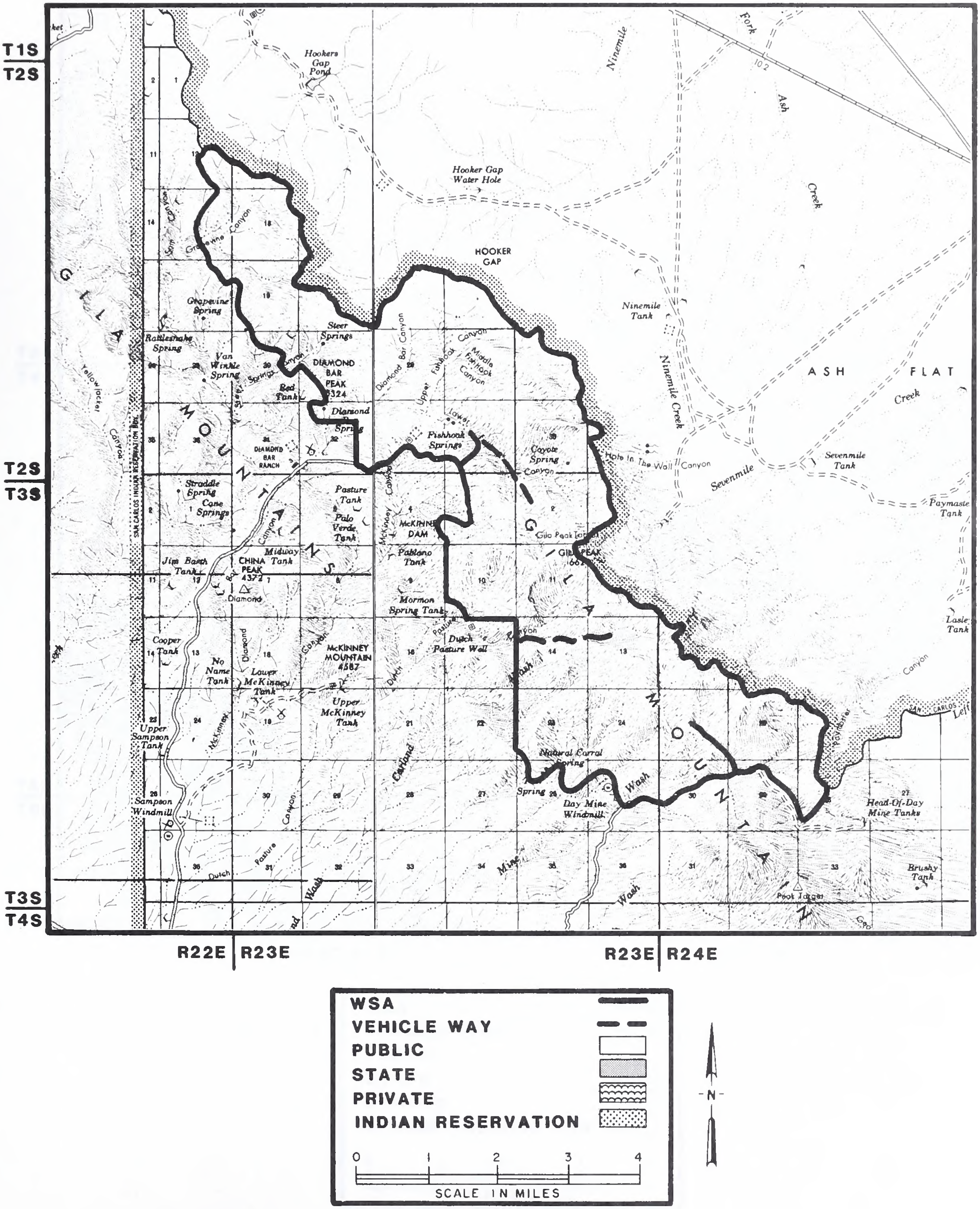


NO WILDERNESS

WSA BOUNDARY	—
AREA PROPOSED FOR WILDERNESS DESIGNATION	▨

FISHHOOKS 4-14

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management-Safford District
MAY 1986
BASEMAP © ADOT



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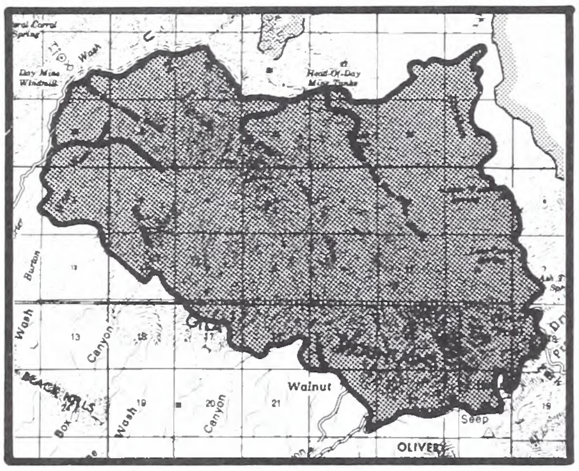

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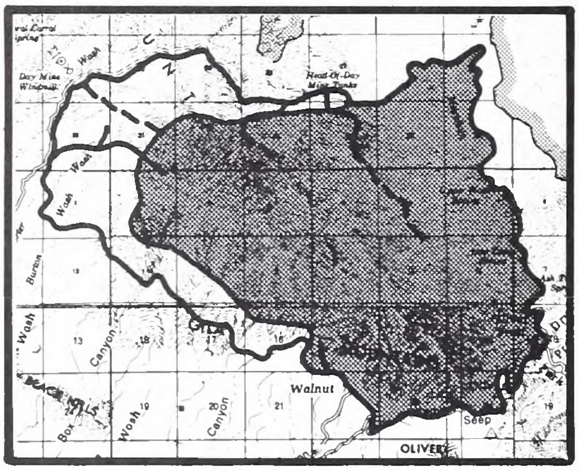
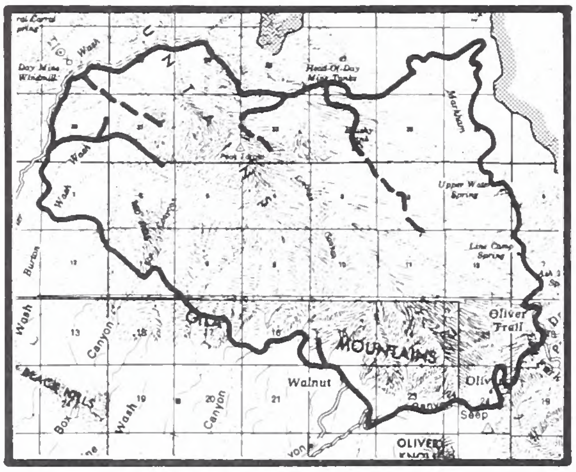


ENHANCED WILDERNESS

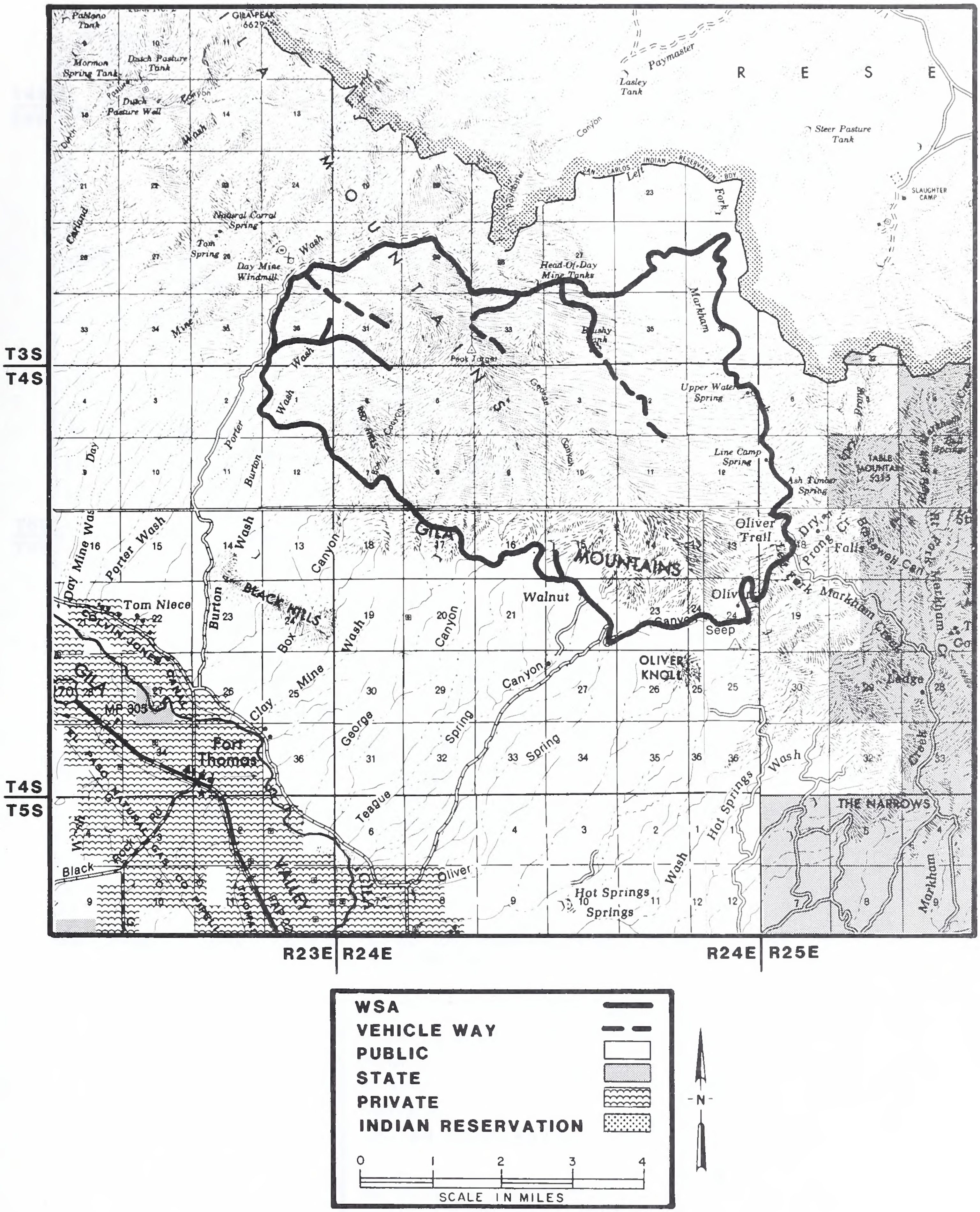


MODERATE WILDERNESS,
PROPOSED ACTION and
NO WILDERNESS

WSA BOUNDARY	—
AREA PROPOSED FOR WILDERNESS DESIGNATION	▨

DAY MINE 4-16

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management–Safford District
MAY 1986
BASEMAP © ADOT



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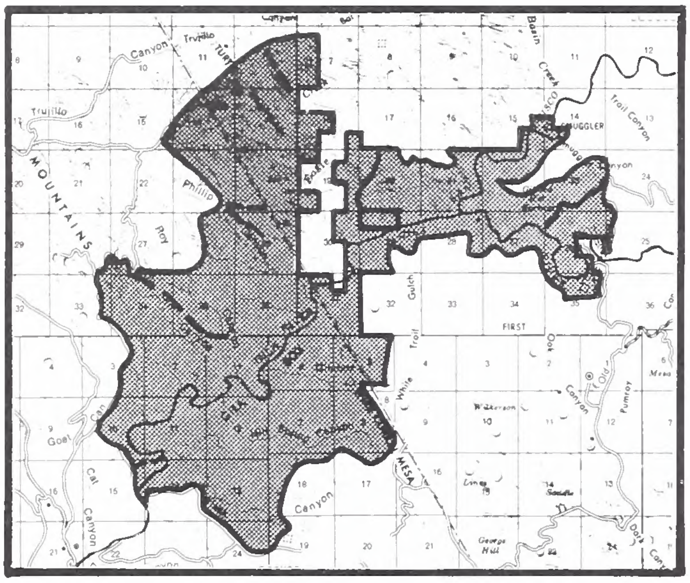
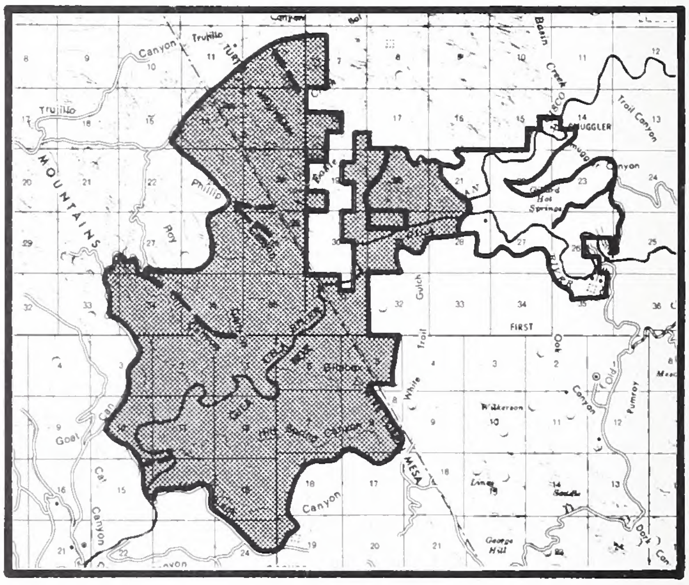


ALL WILDERNESS



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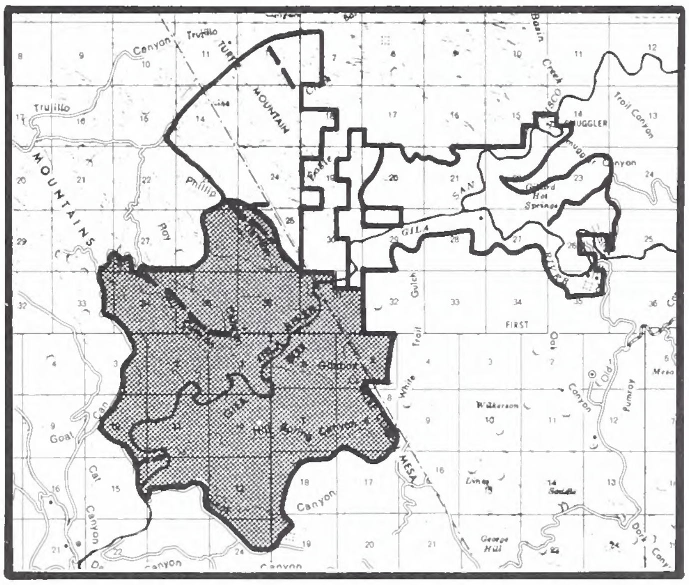
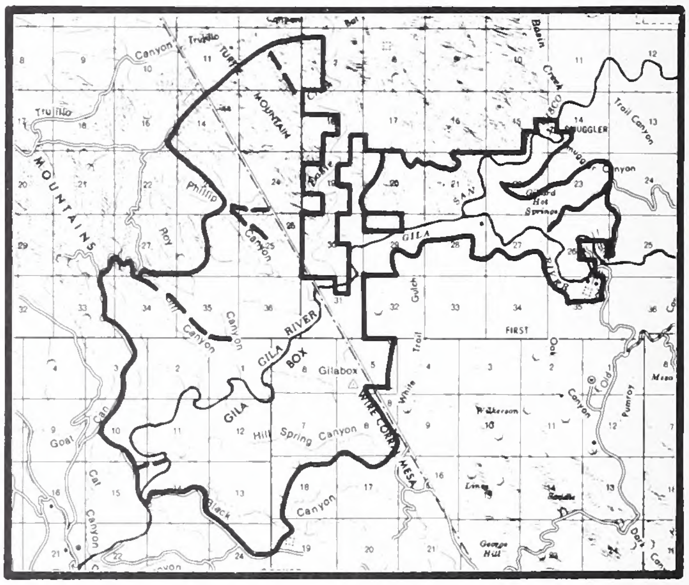


MODERATE WILDERNESS

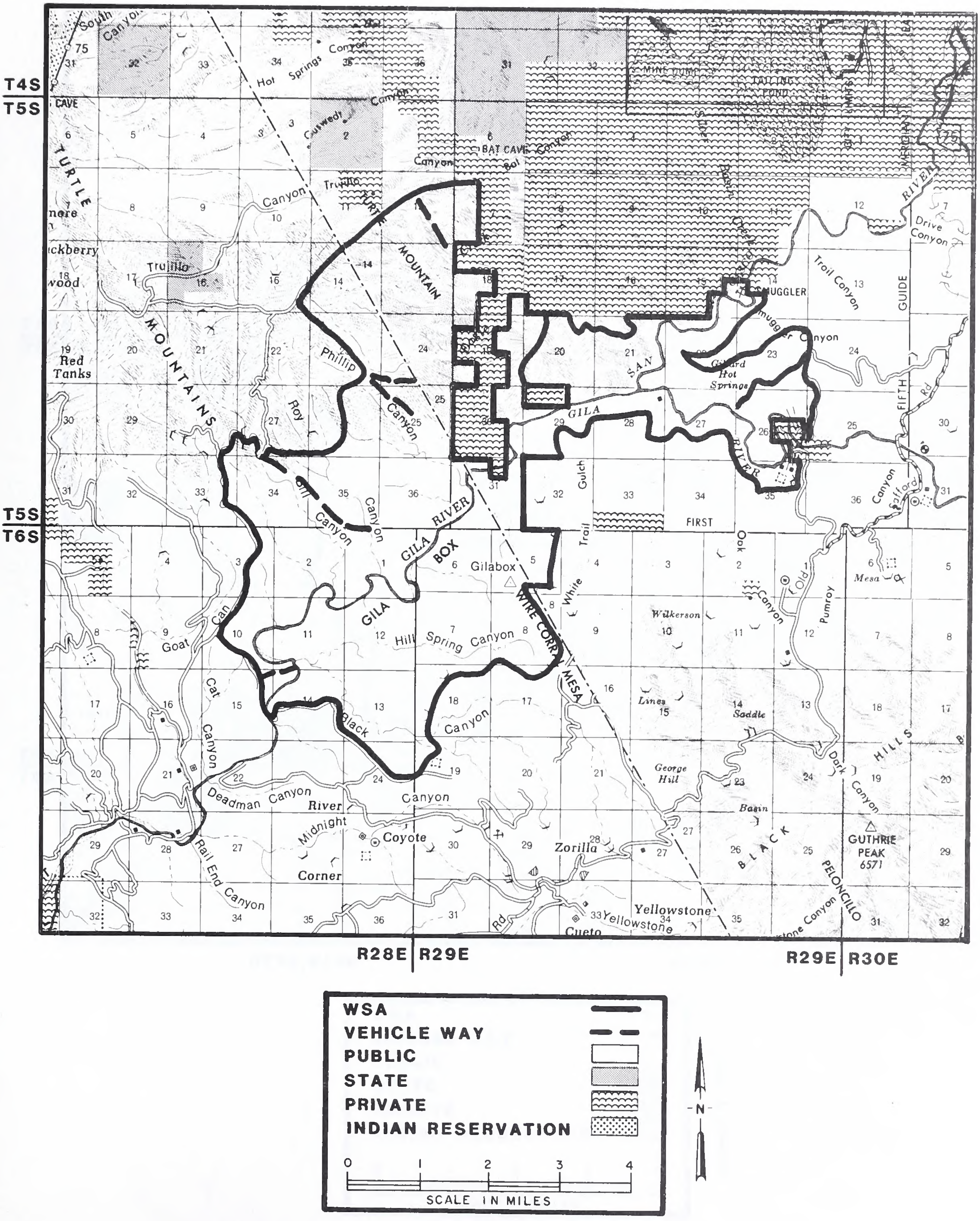


PROPOSED ACTION and
NO WILDERNESS

WSA BOUNDARY	▬
AREA PROPOSED FOR WILDERNESS DESIGNATION	▨

GILA BOX 4-22/23/24 (A)

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management–Safford District
MAY 1986
BASEMAP © ADOT



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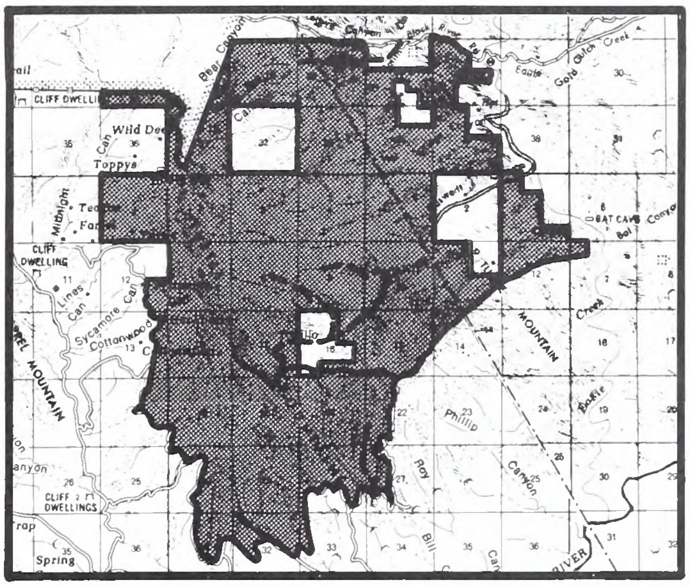

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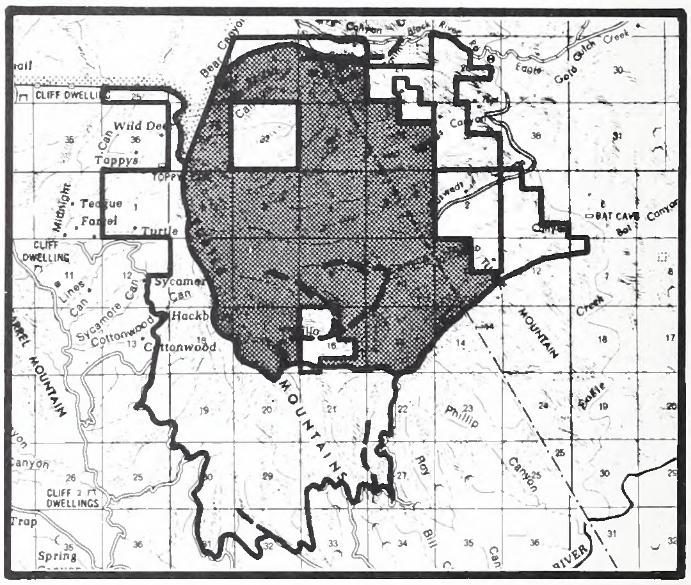

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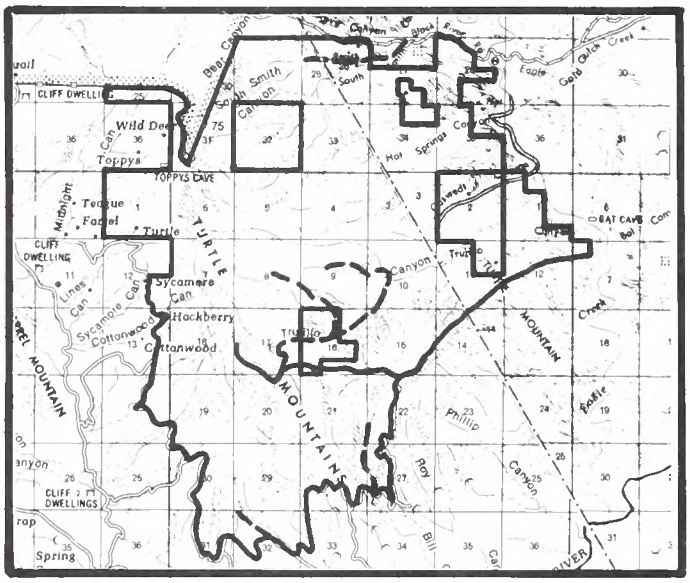
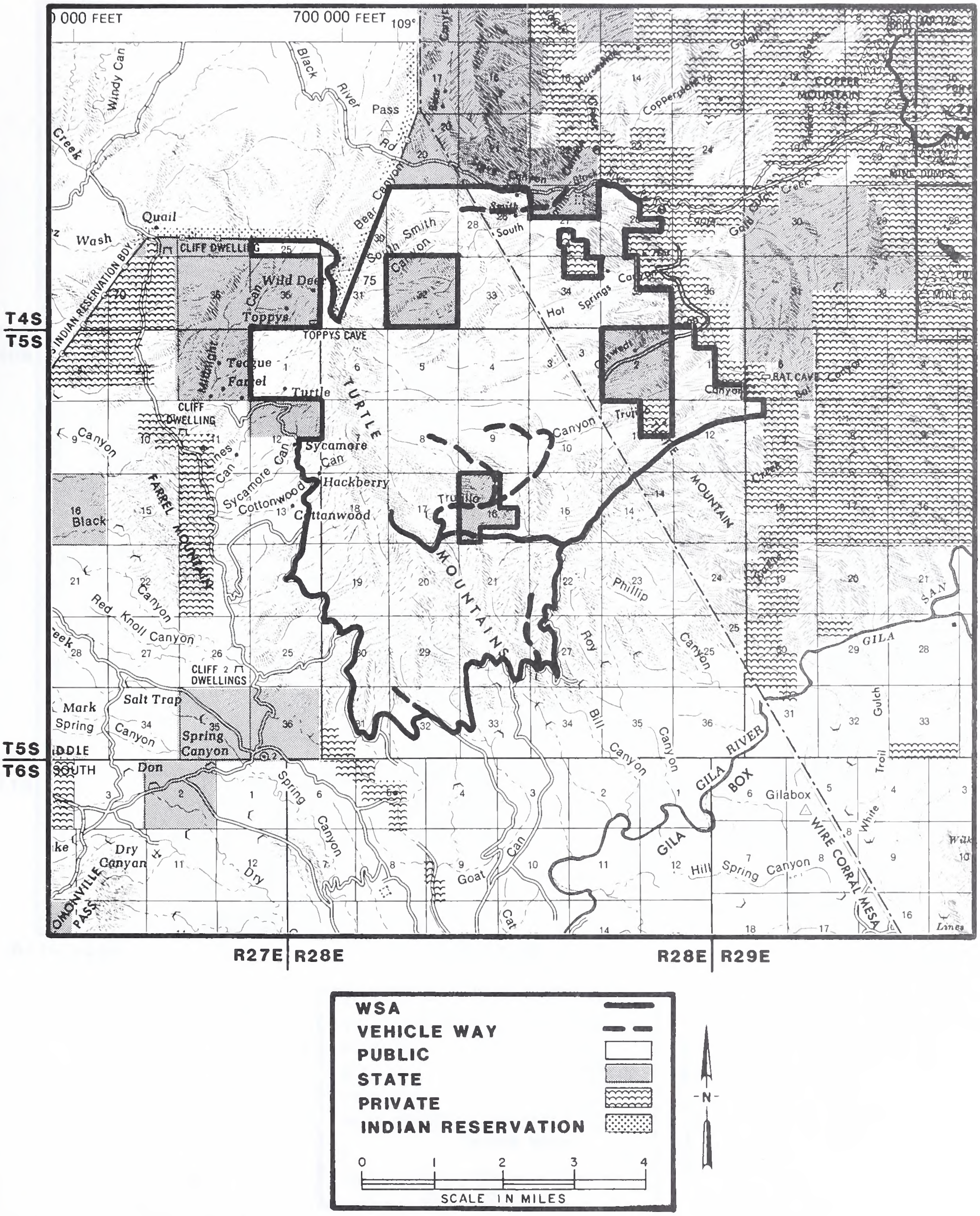


MODERATE WILDERNESS,
PROPOSED ACTION and
NO WILDERNESS

WSA BOUNDARY	—
AREA PROPOSED FOR WILDERNESS DESIGNATION	▨

TURTLE MOUNTAIN 4-22/23/24 (B)

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management-Safford District
MAY 1986 BASEMAP © ADOT



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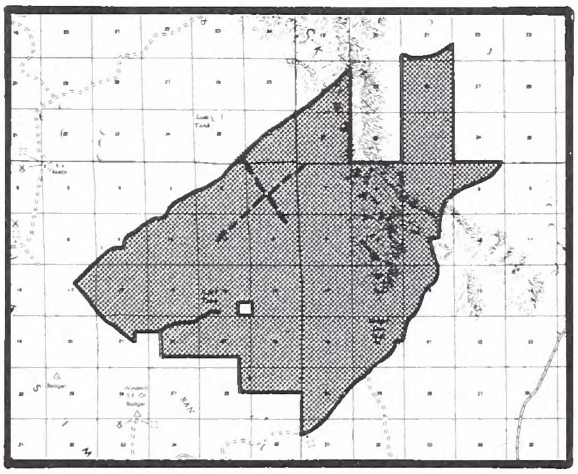

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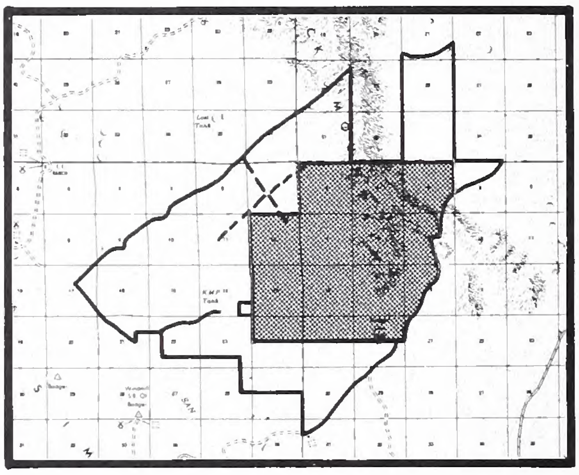

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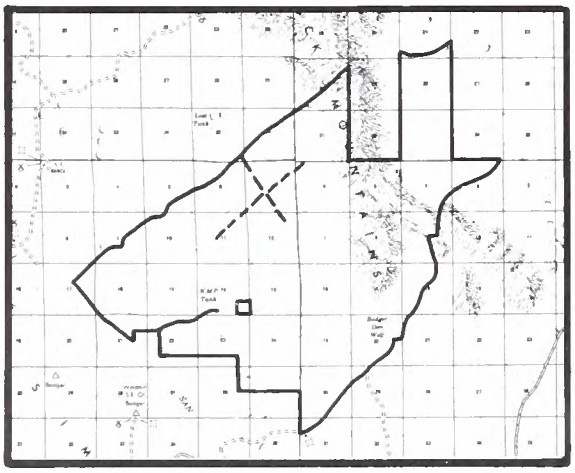
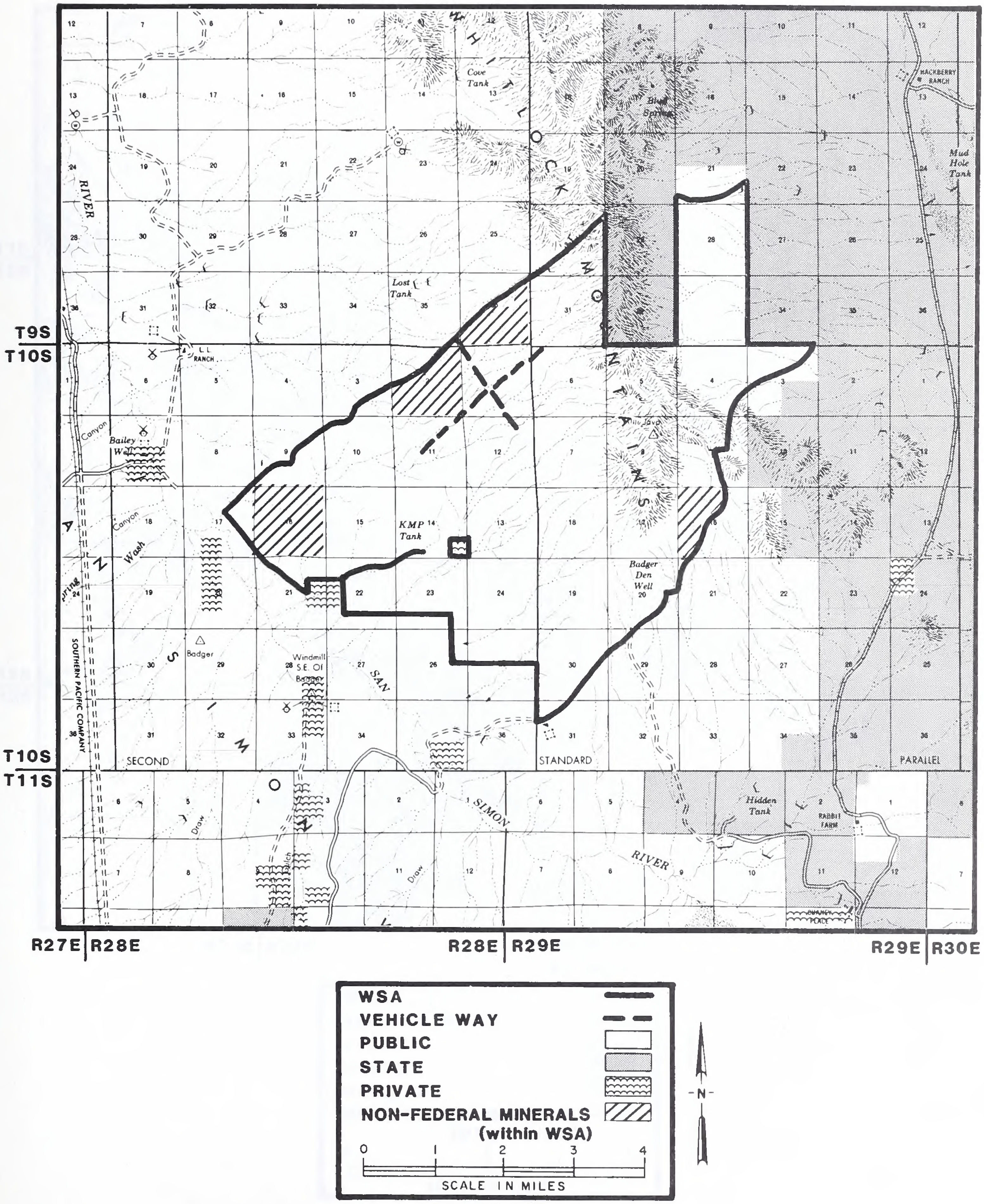


MODERATE WILDERNESS,
PROPOSED ACTION and
NO WILDERNESS

WSA BOUNDARY	—
AREA PROPOSED FOR WILDERNESS DESIGNATION	▨

JAVELINA PEAK 4-48

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management–Safford District
MAY 1986 BASEMAP © ADOT



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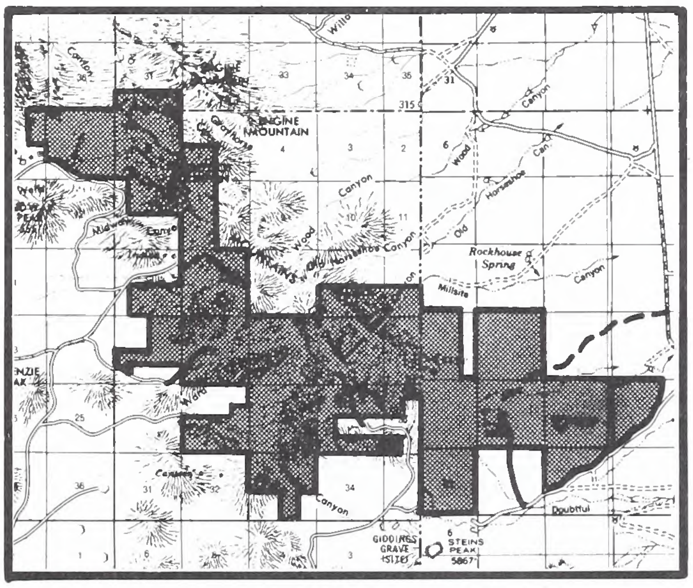

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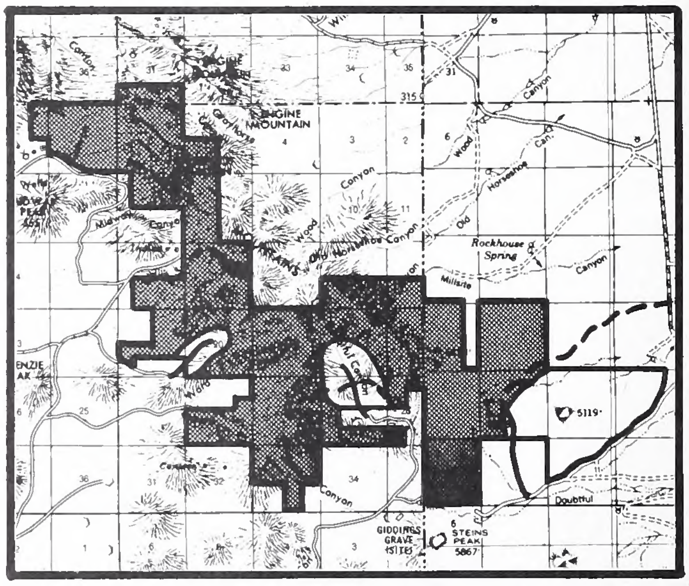

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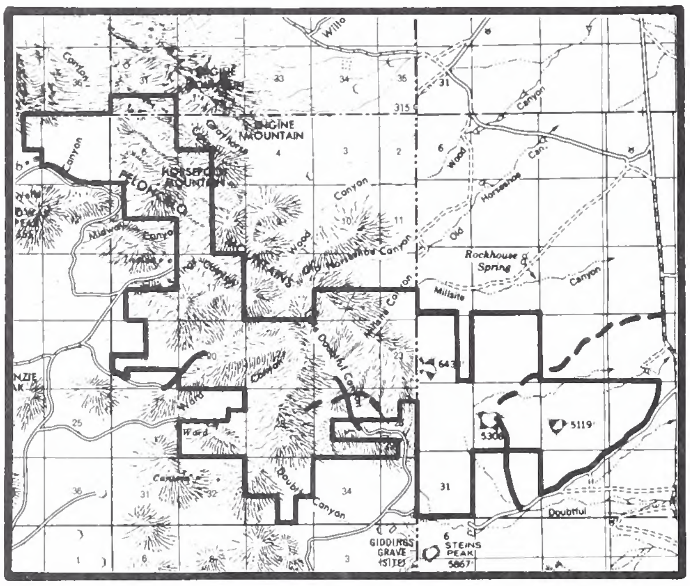


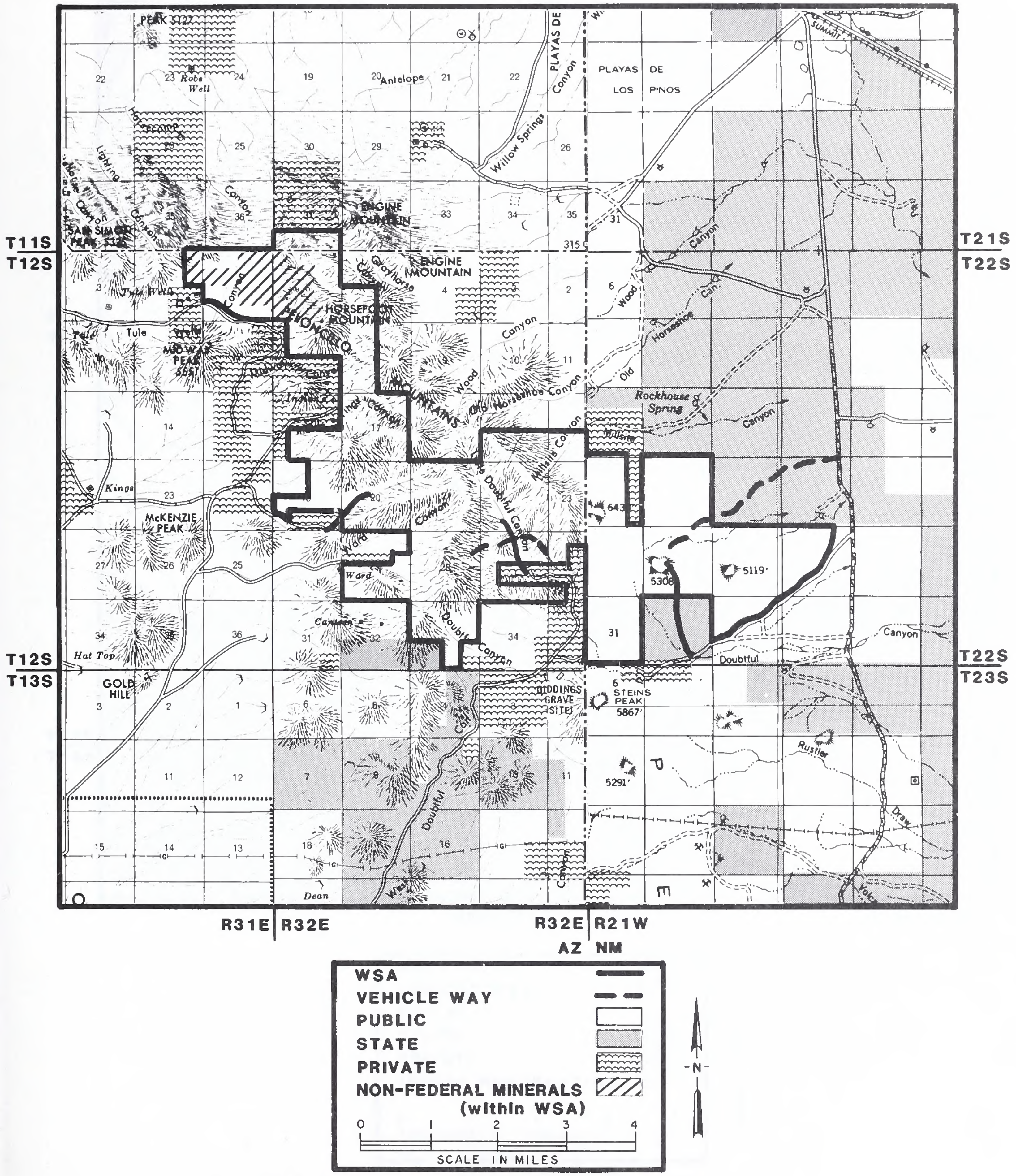
MODERATE WILDERNESS, PROPOSED ACTION and NO WILDERNESS

WSA BOUNDARY ─

AREA PROPOSED FOR WILDERNESS DESIGNATION ▨

PELONCILLO MOUNTAINS 4-60

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management-Safford District
BASEMAP © NMSHD MAY 1986 BASEMAP © ADOT



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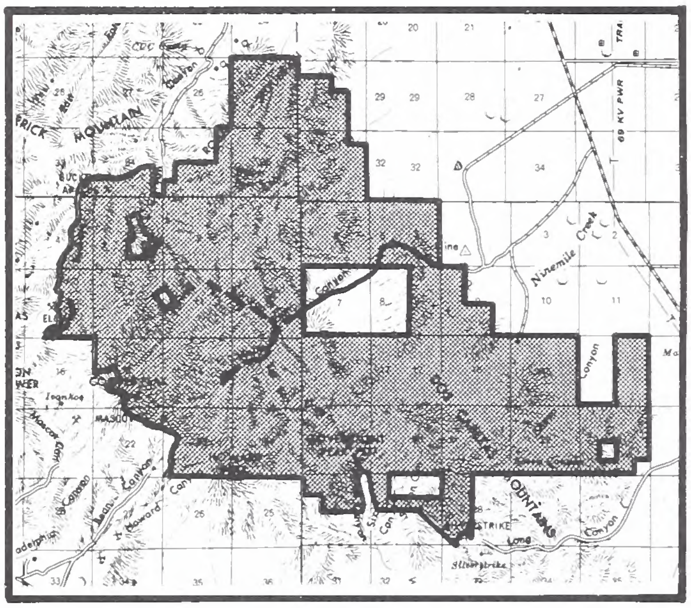
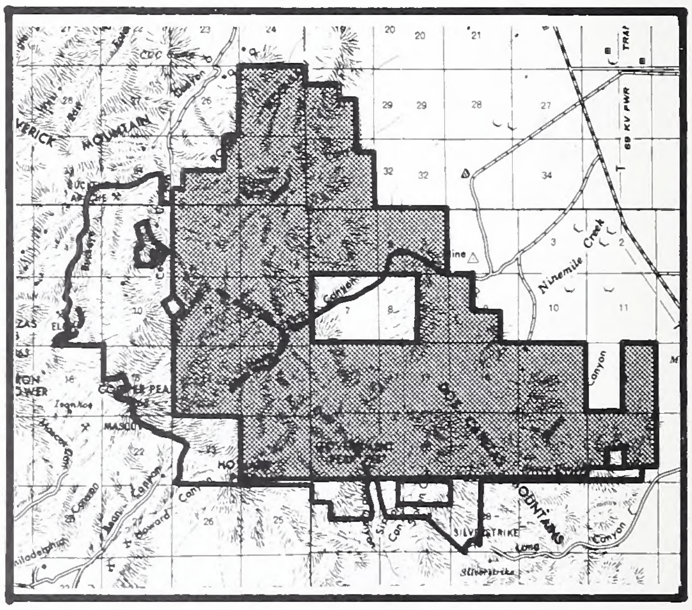
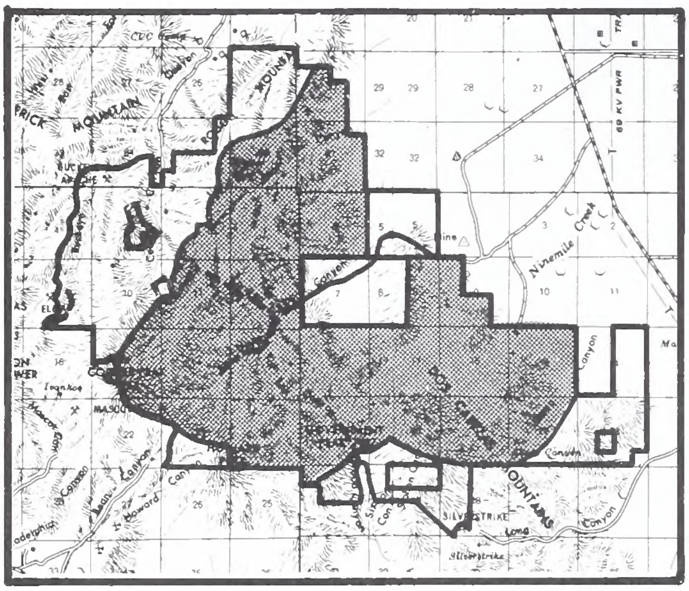


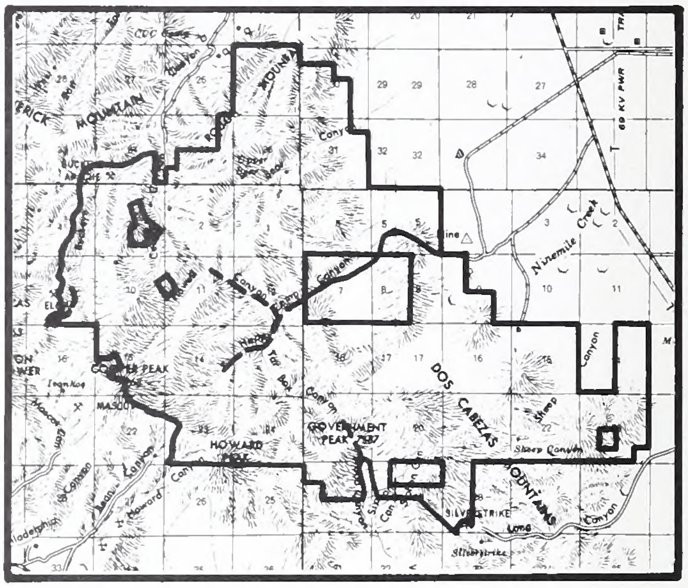
ALL WILDERNESS



ENHANCED WILDERNESS



MODERATE WILDERNESS and PROPOSED ACTION



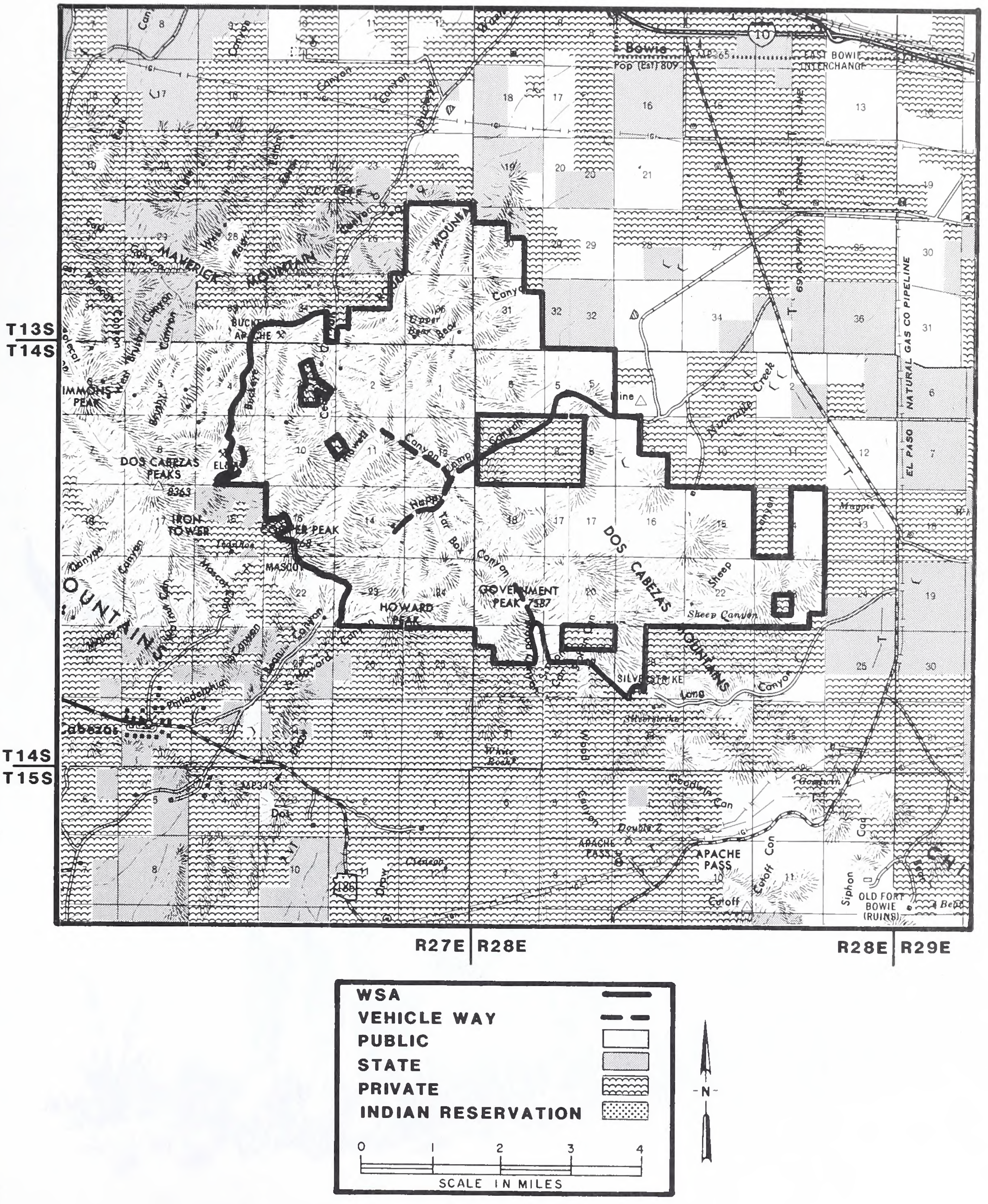
NO WILDERNESS

WSA BOUNDARY —

AREA PROPOSED FOR WILDERNESS DESIGNATION ▨

DOS CABEZAS MTNS. 4-65

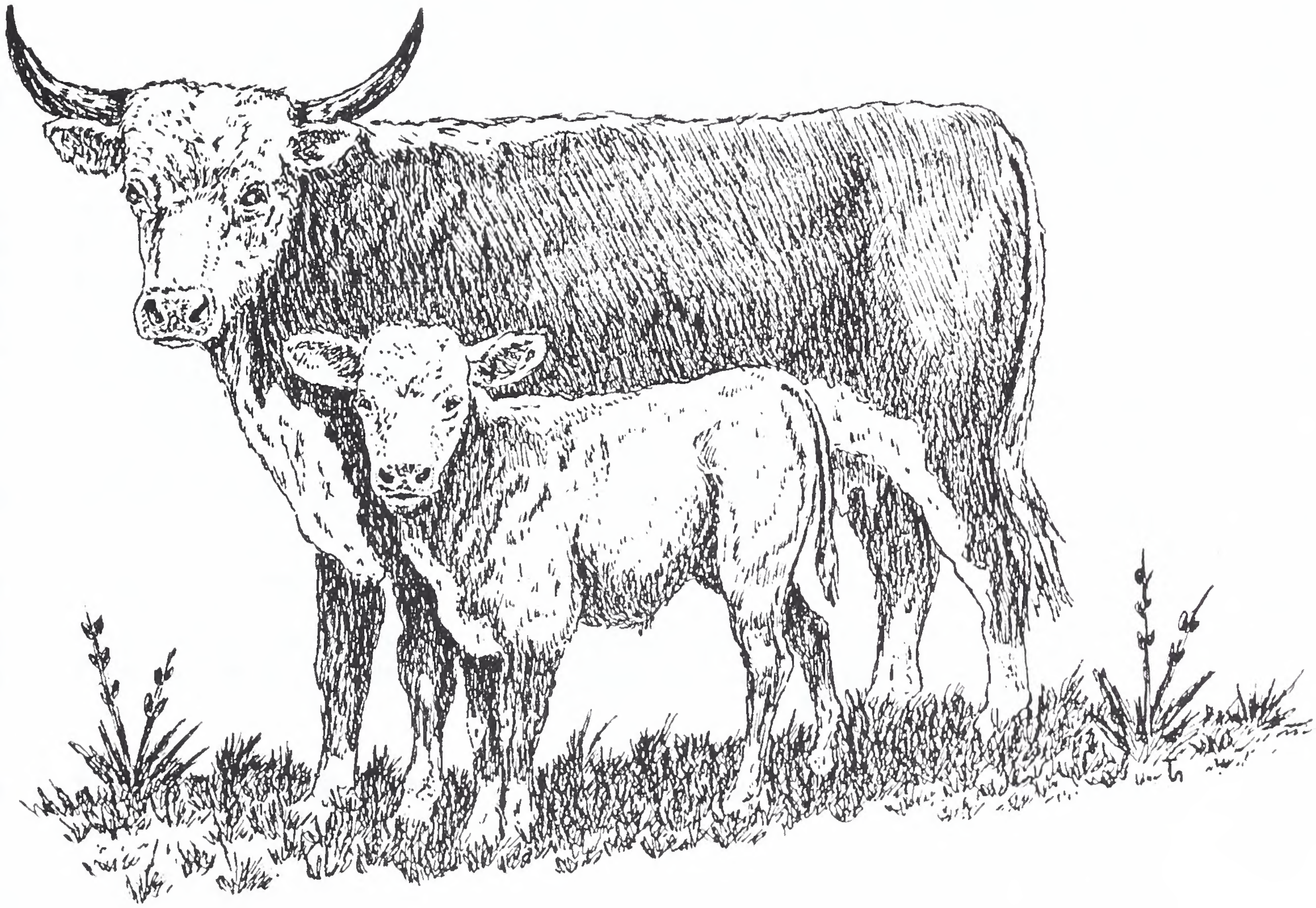
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management-Safford District
MAY 1986 BASEMAP © ADOT



MAP 29

BLM LIBRARY
RS 150A BLDG. 50
DENVER FEDERAL CENTER
P.O. BOX 25047
DENVER, CO 80225

APPENDICES



APPENDIX NO. 1

LIST OF WATER SOURCES BY WSA

List of Water Sources

Bureau of Land Management
Safford District, Arizona

Needle's Eye WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Spring	T. 3 S., R. 17 E., Sec. 14, NESE	Undeveloped	BLM PWR 107, 1926	0.03 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 3 S., R. 18 E., Sec. 19, SWNW	Undeveloped			
Spring	T. 3 S., R. 17 E., Sec. 28, SWNE	Undeveloped	BLM PWR 107, 1926	0.02	LS
				0.09	WL/F
				0.01 ac.ft.	Rec
Spring	T. 3 S., R. 17 E., Sec. 17, NESE	Developed	BLM 36, 1979		
			BLM PWR 107, 1926	0.12	LS
				0.01	WL
				0.01	Rec
Spring	T. 3 S., R. 17 E., Sec. 17, SESE	Undeveloped			
Spring	T. 3 S., R. 18 E., Sec. 19, SWNW	Undeveloped			
Spring	T. 3 S., R. 17 E., Sec. 20, NWSW	Undeveloped	BLM 33, 1982		
			BLM PWR 107, 1926	0.25	LS
				0.90	WL/F
				0.01 ac.ft.	Rec
Spring	T. 3 S., R. 17 E., Sec. 21, NWNW	Developed	BLM 36, 1979		
			BLM PWR 107, 1926	0.17	LS
				0.01	WL
				0.01	Rec
Spring	T. 3 S., R. 17 E., Sec. 22, NWSW	Undeveloped			
Spring	T. 3 S., R. 17 E., Sec. 22, SENE	Undeveloped	Pvt. No. 483, 1931		
Spring	T. 3 S., R. 17 E., Sec. 22, NWNE	Undeveloped			
Spring	T. 3 S., R. 17 E., Sec. 22, NWSW	Undeveloped			
Spring	T. 3 S., R. 17 E., Sec. 28, SENW	Undeveloped			
Spring	T. 3 S., R. 17 E., Sec. 29, NENE	Undeveloped	BLM 36, 1979		
			BLM PWR 107, 1926	0.03	LS
				0.02	WL
				0.01 ac.ft.	Rec
Spring	T. 3 S., R. 17 E., Sec 23, SWSW	Undeveloped	BLM PWR 107, 1926	0.13	LS
				0.78	WL/F
				0.01	Rec
Spring	T. 4 S., R. 17 E., Sec. 6, SWNW	Undeveloped	BLM PWR 107, 1926	0.34	LS
				0.01	WL
Spring	T. 3 S., R. 17 E., Sec. 26, NENW	Undeveloped			
Spring	T. 3 S., R. 17 E., Sec. 28, SWNW	Undeveloped	BLM 36, 1979		
			BLM PWR 107, 1926	0.03 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 3 S., R. 17 E., Sec. 28, NWNE	Undeveloped	BLM PWR 107, 1926	0.02	LS
				0.84	WL/F
				0.01	Rec

Black Rock WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Reservoir	T. 6 S., R. 21 E., Sec. 1, NESE		BLM 38		
Reservoir	T. 6 S., R. 21 E., Sec. 2, SESE		BLM 33		
Reservoir	T. 6 S., R. 22 E., Sec. 6, SESW				
Reservoir	T. 6 S., R. 21 E., Sec. 1, SESE		BLM 38		
Reservoir	T. 6 S., R. 22 E., Sec. 30, NENE				
Reservoir	T. 6 S., R. 22 E., Sec. 19, SWNW				
Spring	T. 6 S., R. 22 E., Sec. 19, SWNW	Undeveloped	BLM 36, 1979		
			BLM PWR 107, 1926	0.25 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 6 S., R. 22 E., Sec. 18, SWSW	Undeveloped			
Spring	T. 6 S., R. 21 E., Sec. 2, SWNE	Developed	Non-appropriable		
Spring	T. 6 S., R. 21 E., Sec. 13, SWSW	Undeveloped	BLM PWR 107, 1926	0.44	LS
				0.02	WL
				0.01	Rec
Spring	T. 6 S., R. 22 E., Sec. 18, NWSW	Undeveloped	BLM 36, 1979		
			BLM PWR 107, 1926	0.25 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 6 S., R. 22 E., Sec. 18, SESE	Undeveloped			

Fishhooks WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Reservoir	T. 3 S., R. 23 E., Sec. 3, SWSW				
Reservoir	T. 3 S., R. 23 E., Sec. 13, SWNW		BLM 38		
Reservoir	T. 3 S., R. 23 E., Sec. 3, NWSW				
Spring	T. 2 S., R. 23 E., Sec. 18, NWNW		Pvt. No. 760, 1933		
			BLM PWR 107, 1926	0.13	LS
				1.12	WL/F
				0.01	Rec
Spring	T. 2 S., R. 23 E., Sec. 27, NENW		BLM PWR 107, 1926	0.08 ac.ft.	LS
				1.12	WL/F
				0.01	Rec
Catchment	T. 3 S., R. 23 E., Sec. 14, NWNW				
Reservoir	T. 2 S., R. 23 E., Sec. 19, SESW				
Spring	T. 2 S., R. 23 E., Sec. 28, NENE				
Spring	T. 3 S., R. 23 E., Sec. 10, NESW	Developed			
Spring	T. 3 S., R. 23 E., Sec. 29, SENW	Undeveloped			
Spring	T. 3 S., R. 23 E., Sec. 29, NENW	Undeveloped			
Well	T. 2 S., R. 23 E., Sec. 33, NESW	Developed			
Spring	T. 2 S., R. 23 E., Sec. 19, SWSW	Undeveloped			
Spring	T. 2 S., R. 23 E., Sec. 30, NESE				
Spring	T. 2 S., R. 23 E., Sec. 34, NWNW	Developed			
Spring	T. 2 S., R. 23 E., Sec. 34, NWNW	Undeveloped	Pvt. 38, 1956		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.10	LS
				0.01	WL
				0.01	Rec

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Spring	T. 2 S., R. 23 E., Sec. 27, NWSW	Undeveloped	BLM PWR 107, 1926	0.13 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 2 S., R. 23 E., Sec. 27, NESE	Undeveloped	BLM PWR 107, 1926	0.13	LS
				0.45	WL/F
				0.01	Rec
Spring	T. 2 S., R. 23 E., Sec. 35, SESW	Undeveloped			
Spring	T. 2 S., R. 23 E., Sec. 35, SWSE	Undeveloped			
Spring	T. 2 S., R. 23 E., Sec. 35, SWSE	Undeveloped	Pvt. 38, 1937		
			BLM PWR 107, 1926	0.07 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 3 S., R. 23 E., Sec. 11, SWNE	Undeveloped			
Reservoir	T. 3 S., R. 23 E., Sec. 23, SESE		BLM 38		
Reservoir	T. 3 S., R. 23 E., Sec. 23, SESE		BLM 38		
Reservoir	T. 3 S., R. 23 E., Sec. 26, NWSE		BLM 38		
Spring	T. 3 S., R. 23 E., Sec. 26, NENW	Developed	Pvt. WRRA, 1978		
			BLM PWR 107, 1926	0.25	LS
				0.01	WL
				0.01	Rec
Reservoir	T. 3 S., R. 24 E., Sec. 19, NWSE		BLM 38		

Day Mine WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Reservoir	T. 3 S., R. 24 E., Sec. 34, SESW				
Reservoir	T. 3 S., R. 24 E., Sec. 36, SWNE		BLM 38		
Reservoir	T. 4 S., R. 24 E., Sec. 2, SENW		BLM 38		
Reservoir	T. 3 S., R. 24 E., Sec. 34, SESW		BLM 38		
Reservoir	T. 3 S., R. 24 E., Sec. 33, SWNW				
Reservoir	T. 3 S., R. 24 E., Sec. 31, SWNW				
Reservoir	T. 4 S., R. 24 E., Sec. 15, NWSW				
Reservoir	T. 3 S., R. 24 E., Sec. 29, SWNE		BLM 38		
Reservoir	T. 3 S., R. 24 E., Sec. 31, SWSE		BLM 38		
Storage Tank	T. 3 S., R. 24 E., Sec. 29, NESE				
Storage Tank	T. 4 S., R. 24 E., Sec. 9, NWSE				
Spring	T. 4 S., R. 24 E., Sec. 16, NESW	Undeveloped			
Spring	T. 4 S., R. 24 E., Sec. 1, SENE	Undeveloped	Pvt. WRRA, 1978		
Spring	T. 4 S., R. 25 E., Sec. 7, NESW	Undeveloped	Pvt. WRRA, 1978		
			BLM PWR 107, 1926	0.34 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 4 S., R. 24 E., Sec. 24, SENW	Developed	Pvt. WRRA, 1978		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.34	LS
				0.01	WL
				0.01	Rec

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Spring	T. 4 S., R. 25 E., Sec. 7, SWNW	Undeveloped	Pvt. WRRA, 1978		
			BLM PWR 107, 1926	0.34 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 4 S., R. 24 E., Sec. 23, SENE	Undeveloped	Pvt. WRRA, 1978		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.08	LS
				0.90	WL/F
				0.01	Rec
Spring	T. 4 S., R. 25 E., Sec. 18, NWNW	Undeveloped	Pvt. WRRA, 1978		
Reservoir	T. 3 S., R. 23 E., Sec. 25, SWSE				

Gila Box WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Reservoir	T. 5 S., R. 28 E., Sec. 34, SWNW		BLM 38		
Reservoir	T. 5 S., R. 28 E., Sec. 34, NESW				
Spring	T. 6 S., R. 28 E., Sec. 2, NESE	Undeveloped	BLM PWR 107, 1926	0.08 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 6 S., R. 28 E., Sec. 2, NWSE	Undeveloped	BLM PWR 107, 1926	0.08	LS
				0.56	WL/F
				0.01	Rec
Spring	T. 6 S., R. 28 E., Sec. 2, NWNE	Undeveloped			
Spring	T. 5 S., R. 28 E., Sec. 24, NWNW	Developed	BLM 36, 1979		
			BLM PWR 107, 1926	0.67 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 5 S., R. 28 E., Sec. 24, NENE	Undeveloped	Pvt. 38, 1920		
Spring	T. 5 S., R. 28 E., Sec. 13, SWSE	Developed	Pvt. 36, 1975-79		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.08	LS
				0.01	WL
				0.01	Rec
Reservoir	T. 5 S., R. 28 E., Sec. 12, NWSW				
Spring	T. 5 S., R. 28 E., Sec. 13, NWNE	Undeveloped			
Spring	T. 6 S., R. 28 E., Sec. 12, NWSE	Developed			

Turtle Mountain WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Spring	T. 5 S., R. 27 E., Sec. 12, NWSE	Developed	BLM 36, 1979		
			BLM PWR 107, 1926	0.84 ac.ft.	LS
				0.11	WL/F
				0.01	Rec
Spring	T. 5 S., R. 27 E., Sec. 1, SESW	Developed	Pvt. Cert., 1965		
Spring	T. 5 S., R. 27 E., Sec. 1, SENW				
Spring	T. 5 S., R. 27 E., Sec. 1, NWNE				
Spring	T. 5 S., R. 27 E., Sec. 1, SESE				

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Reservoir	T. 5S., R. 28 E., Sec. 21, SWNE		BLM 38		
Reservoir	T. 5 S., R. 28 E., Sec. 28, NWSW				
Reservoir	T. 5 S., R. 28 E., Sec. 22, NWSW		BLM 38		
Reservoir	T. 5 S., R. 28 E., Sec. 16, SWSE				
Spring	T. 5 S., R. 28 E., Sec. 35, SWSW	Undeveloped			
Reservoir	T. 5 S., R. 28 E., Sec. 3, NESE		BLM 38		
Reservoir	T. 4 S., R. 28 E., Sec. 33, SWNW		BLM 38		
Reservoir	T. 5 S., R. 28 E., Sec. 6, SENE		BLM 38		
Reservoir	T. 4 S., R. 28 E., Sec. 33, NWNW		BLM 38		
Reservoir	T. 4 S., R. 28 E., Sec. 33, SWNW		BLM 38		
Reservoir	T. 4 S., R. 28 E., Sec. 28, SWSW				
Reservoir	T. 4 S., R. 28 E., Sec. 29, NWSW				
Reservoir	T. 5 S., R. 28 E., Sec. 5, NESW				
Reservoir	T. 5 S., R. 28 E., Sec. 15, SWNE				
Reservoir	T. 5 S., R. 28 E., Sec. 29, SENE				
Spring	T. 4 S., R. 28 E., Sec. 34, SENW	Undeveloped	Pvt. WRRA, 1978		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.37	LS
				0.67	WL/F
				0.01	Rec
Spring	T. 5 S., R. 28 E., Sec. 1, SWSE	Undeveloped	BLM PWR 107, 1926	0.08 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 4 S., R. 28 E., Sec. 28, NENE	Developed	Pvt. Cert., 1941		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.34	LS
				0.01	WL
				0.01	Rec
Spring	T. 4 S., R. 28 E., Sec. 28, SENE	Developed	Pvt. Cert., 1941		
			Pvt. Cert., 1931		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.84 ac.ft.	LS
				0.01	WL
				0.01	Rec
Spring	T. 4 S., R. 28 E., Sec. 35, NWNW		Pvt. WRRA		
			Pvt. Cert., 1937		
			BLM PWR 107, 1926	0.34	LS
				0.01	WL
Spring	T. 5 S., R. 28 E., Sec. 3, NESE	Developed			
Spring	T. 5 S., R. 28 E., Sec. 1, NWNW				
Spring	T. 5 S., R. 28 E., Sec. 1, NESW	Developed			
Reservoir	T. 5 S., R. 28 E., Sec. 17, SESW				
Reservoir	T. 5 S., R. 28 E., Sec. 17, SENE				

Javelina Peak WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Catchment	T. 9 S., R. 28 E., Sec. 36, SENE		Non-appropriable		
Reservoir	T. 9 S , R. 29 E., Sec. 21, SESW				
Reservoir	T. 9 S., R. 29 E., Sec. 21, NESE				
Eight Reservoirs	T. 9 S., R. 29 E., Sec. 33, SW		BLM 33		

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Reservoir	T. 10 S., R. 28 E., Sec. 12, NENW		BLM 38		
Reservoir	T. 10 S., R. 28 E., Sec. 25, SESE		BLM 38		
Reservoir	T. 10 S., R. 29 E., Sec. 9, SENW		BLM 38		
Well	T. 10 S., R. 29 E., Sec. 20, SWNE				
Reservoir	T. 10 S., R. 29 E., Sec. 20, SWNE				
Spring	T. 10 S., R. 29 E., Sec. 8, NENE	Undeveloped			

Peloncillo Mountains WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Spring	T. 12 S., R. 32 E., Sec. 14, SWSW	Developed			
Reservoir	T. 12 S., R. 32 E., Sec. 27, NWNE		BLM 38		
Reservoir	T. 12 S., R. 32 E., Sec. 27, SWNW		BLM 38		
Reservoir	T. 12 S., R. 32 E., Sec. 27, SWSW		BLM 38		
Reservoir	T. 12 S., R. 32 E., Sec. 22, NESW		BLM 38		
Reservoir	T. 12 S., R. 32 E., Sec. 33, SWSE		BLM 38		
Reservoir	T. 12 S., R. 32 E., Sec. 20, SWNE		BLM 38		
Reservoir	T. 12 S., R. 32 E., Sec. 20, SWNE				
Reservoir and Storage	T. 22 S., R. 21 W., Sec. 29, NWSE				
Reservoir	T. 12 S., R. 32 E., Sec. 22, NESW				

Dos Cabezas Mountains WSA

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Spring	T. 14 S., R. 27 E., Sec. 3, SESE		BLM 36, 1979		
Spring	T. 14 S., R. 27 E., Sec. 3, NENW	Developed	Pvt. Cert., 1964		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.17 ac.ft.	LS
				0.13	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 3, NENE	Developed	Pvt. Cert., 1964		
			BLM 36, 1979		
			BLM PWR 107, 1926	0.17	LS
				0.03	WL
				0.01	Rec
Spring	T. 13 S., R. 27 E., Sec. 35, SESW	Undeveloped	Pvt. Cert., 1964		
			BLM PWR 107, 1926	0.10	LS
				0.01	WL
				0.01	Rec
Spring	T. 13 S., R. 27 E., Sec. 36, SESE	Unknown	BLM		
Spring	T. 13 S., R. 27 E., Sec. 25, SENW	Unknown	BLM		
Spring	T. 14 S., R. 27 E., Sec. 3, SESE		BLM 36, 1979		
Spring	T. 14 S., R. 27 E., Sec. 4, NESE	Developed	Pvt. Cert., 1964		

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Spring	T. 14 S., R. 27 E., Sec. 9, NWSE	Undeveloped			
Spring	T. 14 S., R. 27 E., Sec. 9, SESW	Undeveloped			
Spring	T. 14 S., R. 27 E., Sec. 10, NENW		BLM 36, 1979		
Spring	T. 14 S., R. 27 E., Sec. 10, SWNE		Pvt. Cert., 1964		
			BLM PWR 107, 1926	0.13 ac.ft.	LS
				0.02	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 1, NWNW	Pvt. 36, 1978			
Spring	T. 14 S., R. 27 E., Sec. 13, SWSE	Undeveloped			
Spring	T. 14 S., R. 27 E., Sec. 13, SESE	Undeveloped	BLM PWR 107, 1926	0.17	LS
				0.04	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 14, NESE	Developed	Pvt. Cert., 1941		
Spring	T. 14 S., R. 27 E., Sec. 15, SENE	Developed			
Spring	T. 14 S., R. 27 E., Sec. 15, SESE	Undeveloped	BLM PWR 107, 1926	0.17 ac.ft.	LS
				0.05	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 12, NENE	Developed			
Spring	T. 14 S., R. 27 E., Sec. 24, SWSE	Developed	BLM 36		
			BLM PWR 107, 1926	0.13	LS
				0.03	WL
				0.01	Rec
Spring	T. 14 S., R. 28 E., Sec. 8, NWSE		Pvt. 36, 1978		
			BLM PWR 107, 1926	0.17 ac.ft.	LS
				0.03	WL
				0.01	Rec
Spring	T. 14 S., R. 28 E., Sec. 9, SWSW	Undeveloped	BLM PWR 107, 1926	0.17	LS
				0.03	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 16, NWSE	Unknown	BLM		
Spring	T. 14 S., R. 28 E., Sec. 17, SENW	Undeveloped	Pvt. 36, 1978		
			BLM PWR 107, 1926	0.17 ac.ft.	LS
				0.03	WL
				0.01	Rec
Spring	T. 14 S., R. 28 E., Sec. 19, NENW	Developed	Pvt. 36, 1978		
			BLM PWR 107, 1926	0.25	LS
				0.03	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 2, SWNE	Undeveloped	BLM PWR 107, 1926	0.10	LS
				0.01	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 11, NENE	Developed			
Spring	T. 14 S., R. 27 E., Sec. 12, NENE	Developed	BLM PWR 107, 1926	0.10 ac.ft.	LS
				0.04	WL
				0.01	Rec
Spring	T. 14 S., R. 28 E., Sec. 21, NESE	Developed	Pvt. Cert., 1936		
			BLM 36		
			BLM PWR 107, 1926	0.34	LS
				0.04	WL
				0.01	Rec
Spring	T. 14 S., R. 28 E., Sec. 21, NWNW	Undeveloped	BLM PWR 107, 1926	0.34	LS
				0.03	WL
				0.01	Rec
Spring	T. 14 S., R. 27 E., Sec. 23, SWSW	Undeveloped			
Spring	T. 14 S., R. 27 E., Sec. 23, SWSW	Undeveloped			

Type of Water Source	Legal Description	Development	Existing Water Filings*	Quantity of Water	Purpose of Filing**
Catchment and Storage	T. 14 S., R. 28 E., Sec. 17, NESW				

*BLM PWR 107 — Public Water Reserve Filing: An Executive Order signed by President Coolidge on April 17, 1926, that reserved important public springs and natural waterholes on federal lands for future public use.

"33" Filing: A BLM or private application for Permit to Appropriate Water. Application is submitted to the Department of Water Resources, State of Arizona, for use of surface water (streams, springs and all stockponds built after August 27, 1977).

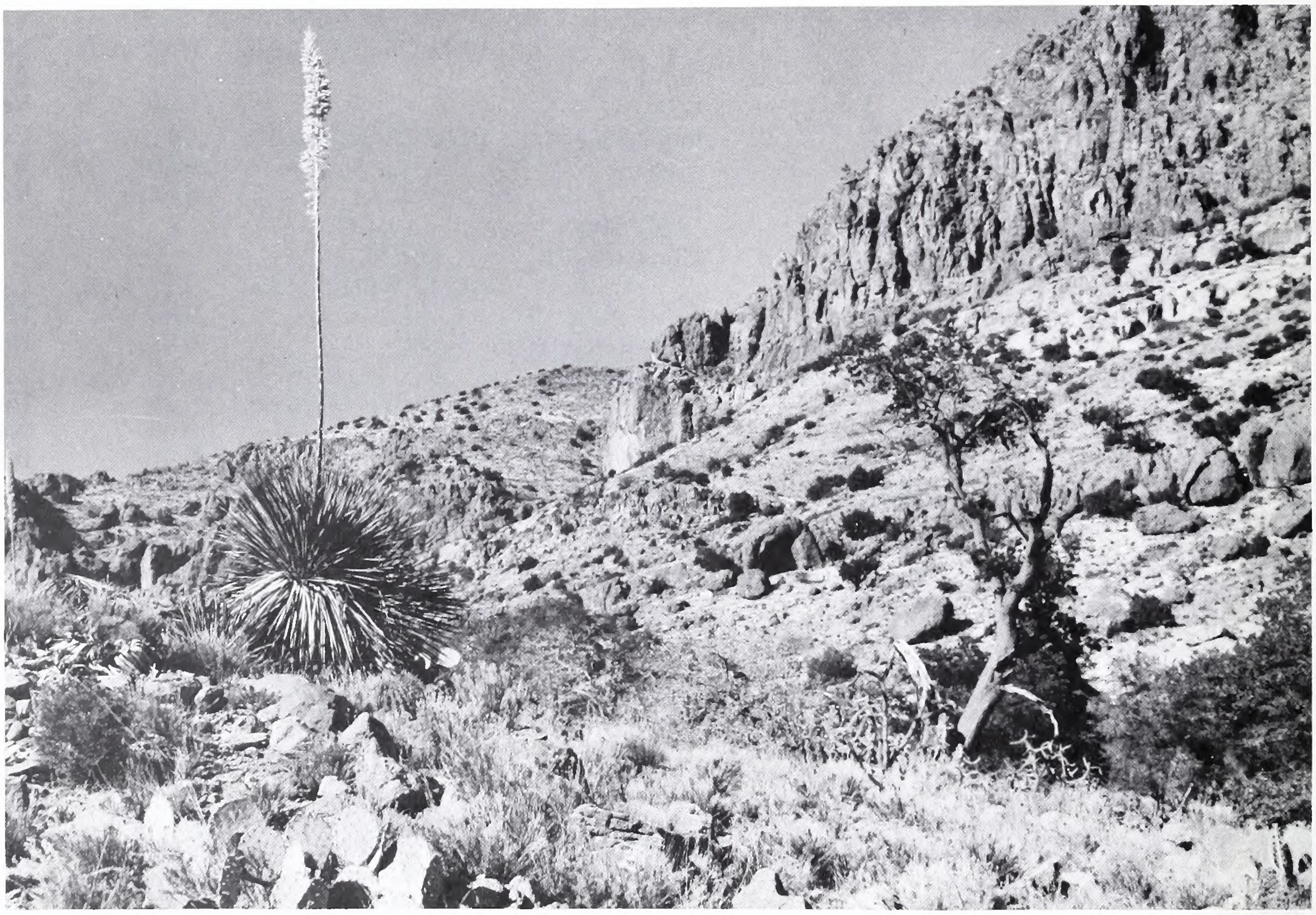
"36" Filing: See WRRA.

"38" Filing: A BLM or private stockpond filing with the State of Arizona under the Stockpond Registration Act of August 27, 1977 for all ponds built between 1919 and August 1977.

WRRA: Water Right Registration Act of 1974, State of Arizona. The applicant (BLM or private) had to file a "36" filing form for all surface waters for which he/she had a pre-1919 beneficial use.

Private Cert. No: Certificate of Water Right for the specified spring as issued by the State of Arizona to the private party.

**	
LS:	Livestock
WL:	Wildlife
WL/F:	Wildlife and Fish
Rec:	Recreation



Dramatic scenery and a diversity of topography and vegetation are among the wilderness-related values in Peloncillo Mountains WSA.

APPENDIX NO. 2
WILDERNESS MANAGEMENT POLICY

U.S. Department of the Interior
Bureau of Land Management
September 24, 1981

WILDERNESS MANAGEMENT POLICY

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Chapter I. Introduction

I. A. The Purpose of This Document

The purpose of this document is to describe how the Bureau of Land Management (BLM) will manage lands administered by the BLM which are designated by Congress as part of the National Wilderness Preservation System. At present, the Bureau of Land Management administers no wilderness areas. The Bureau has developed a Wilderness Management Policy at this time for the following reasons: (1) to inform BLM field officials, Congress, and the public as to how BLM will manage wilderness areas, so this can be taken into account during BLM wilderness studies and during deliberations on wilderness recommendations affecting BLM public lands, and (2) to provide guidance for BLM personnel to use in managing future BLM wilderness areas at such time as Congress designates them.

The BLM's Wilderness Management Policy will apply to public lands administered by BLM that have been specifically designated as wilderness by an Act of Congress. The Wilderness Management Policy has a different purpose than BLM's *Interim Management Policy and Guidelines for Lands under Wilderness Review*. The *Interim* Management Policy is an interim measure governing lands under wilderness review. The Wilderness Management Policy governs lands designated by Congress as wilderness. (Appendix C of this document summarizes BLM's wilderness review process.) If Congress designates a wilderness study area as wilderness, the Interim Management Policy ceases to apply, and instead the Wilderness Management Policy applies thereafter. If Congress decides that a particular wilderness study area will *not* be designated as wilderness, the Interim Management Policy ceases to apply, and the area is managed for the uses and activities indicated in the pertinent BLM planning documents for the area.

This policy document does not apply to BLM-administered public lands in Alaska. If public lands in Alaska are designated as wilderness in the future, they will be managed under applicable provisions of the Wilderness Act of 1964 and in accordance with additional congressional guidance in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA). The ANILCA recognized special conditions in Alaska in connection with such activities as subsistence uses, access and transportation.

I. B. Mandate from Congress

The BLM wilderness review program stems from Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA). In FLPMA, Congress gave BLM its first unified, comprehensive mandate on how the public lands should be managed. The law establishes a policy of generally retaining the public lands in Federal ownership, and it directs the BLM to manage them under principles of multiple use and sustained yield. The BLM is to prepare an inventory of the public lands and their resources, including identification of areas having wilderness characteristics. Management decisions for the public lands are to be made through a land-use planning process that considers all potential uses of each land area. All public lands are to be managed so as to prevent unnecessary or undue degradation of the lands.

Under FLPMA, wilderness preservation is part of BLM's multiple-use mandate, and wilderness values are recognized as part of the spectrum of resource values and uses to be considered in the inventory and in the land-use planning process. Section 603 of FLPMA specifically directs the BLM, for the first time, to carry out a wilderness review of the public lands. (The complete text of section 603 appears in Appendix A of this document. The BLM's wilderness review process implementing section 603 is summarized in Appendix C.)

Section 603(c) of FLPMA tells the BLM how to manage public lands designated as wilderness, in these words:

> "Once an area has been designated for preservation as wilderness, the provisions of the Wilderness Act which apply to national forest wilderness areas shall apply with respect to the administration and use of such designated area, including mineral surveys required by section 4(d)(2) of the Wilderness Act, and mineral development, access, exchange of lands, and ingress and egress for mining claimants and occupants."

The Wilderness Act of 1964 contains a number of provisions addressing the administration and use of national forest wilderness areas. Those most pertinent to BLM wilderness management are cited in the following paragraphs. Section 2(a) says:

> ". . .it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this purpose there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as 'wilderness areas', and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness. . . ."

Section 4 of the Wilderness Act is devoted to the use of wilderness areas. Section 4(b) says:

> "Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character. Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use."

Section 4(c) prohibits certain activities, in these words:

> "Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area."

Sections 4(c), 4(d), and 5 provide special exceptions to the prohibitions in section 4(c) by providing for the following activities:

- — existing private rights.
- — measures required in emergencies involving the health and safety of persons within the area.
- — activities and structures that are the minimum necessary for the administration of the area as wilderness.
- — use of aircraft and motorboats, where already established, may be permitted to continue.
- — measures necessary in the control of fire, insects, and diseases.
- — any activity, including prospecting, for the purpose of gathering information about mineral or other resources, if carried on in a manner compatible with the preservation of the wilderness environment. (This includes mineral surveys conducted on a planned, recurring basis by the Geological Survey and Bureau of Mines.)
- — continued application of the U.S. mining and mineral leasing laws until December 31, 1983.
- — water resource developments may be authorized by the President where he determines that such use will better serve the interests of the United States and the people thereof than will its denial.
- — livestock grazing, where already established, shall be permitted to continue.
- — commercial services necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.
- — adequate access to surrounded State-owned and privately-owned lands, or such lands shall be exchanged for Federally-owned land.
- — ingress and egress to surrounded valid mining claims and other valid occupancies.

Section 5(c) provides land acquisition authority, in these words:

> "Subject to the appropriation of funds by Congress, the Secretary of Agriculture is authorized

to acquire privately owned land within the perimeter of any area designated by this Act as Wilderness if (1) the owner concurs in such acquisition or (2) the acquisition is specifically authorized by Congress."

In addition to the basic management authority in the Wilderness Act, management provisions may appear in the legislation establishing each wilderness area. Standard provisions included in most wilderness legislation make clear that the effective date of the new law will apply wherever the Wilderness Act's management provisions mentioned the effective date of the Wilderness Act, and, for areas administered by the Department of the Interior, make clear that the Secretary of the Interior will continue to administer the areas.

In some cases, special provisions have been incorporated into the legislation (e.g., special mining area in the River of No Return Wilderness in Idaho). These provisions override the general management provisions of the Wilderness Act and must be regarded as specific direction for management of the area in question.

Congress has subsequently commented on wilderness management in House and Senate committee reports and conference reports accompanying wilderness legislation. These reports are part of the legislative history of the laws they accompany and can be helpful in determining the intent of Congress where the language in the law itself is unclear. Although reports on wilderness laws passed after 1964 do not become part of the legislative history of the Wilderness Act, they nonetheless indicate the interpretation given to the Wilderness Act by the congressional committees during their consideration of the subsequent legislation. Such report language addresses a variety of subjects. For example, guidelines for administering grazing use in wilderness areas appear in the Conference Report (House Report 96-1126) on the Central Idaho Wilderness Act of 1980 (P.L. 96-312). House Report 95-540 on the Endangered American Wilderness Act of 1978 discusses the interpretation of the Wilderness Act as it relates to such uses and activities as: hunting and fishing; trails, bridges, and trail signs; control of fire, insects, and diseases; cabins and sanitary facilities; shelters and campsite facilities; and weather modification and special equipment.

The provisions of FLPMA, the Wilderness Act, and future Acts of Congress designating specific BLM areas as wilderness are BLM's mandates on the management of wilderness areas. All activities in wilderness areas must be carried out in conformance with these mandates.

I. C. Meaning of the Congressional Mandate

The congressional mandate contains three basic concepts which form the basis for BLM's Wilderness Management Policy.

— *Wilderness Preservation Concept:*

Congress has directed the BLM to perpetuate the wilderness resource by managing designated wilderness areas so that their wilderness character is preserved unimpaired.

— *Wilderness Use Concept:*

Congress has directed the BLM to provide opportunities for the public to use designated wilderness areas for recreational, scenic, scientific, educational, conservation, and historical purposes in a manner so as to leave the wilderness area unimpaired for future use and enjoyment as wilderness.

— *Nonconforming Use Concept:*

Congress has directed the BLM to accommodate in wilderness areas certain activities, existing uses, and private rights which are generally nonconforming to wilderness preservation and wilderness use.

The meaning of each of these concepts is discussed below.

1. Wilderness Preservation Concept

The Wilderness Act directs that wilderness areas be managed to provide for their protection, the preservation of their natural conditions, and the preservation of their wilderness character. The factors which make up an area's wilderness character are spelled out in the Wilderness Act's definition of wilderness (section 2(c)). These factors are referred to in FLPMA collectively as "wilderness characteristics," and they fall into three broad categories:

a. Naturalness—A wilderness area "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." Wilderness areas must be managed to ensure that this description remains accurate.

b. Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation—A wilderness area "has outstanding opportunities for solitude or a primitive and unconfined type of recreation." Solitude is defined as (1) the state of being alone or remote from habitations; isolation; (2) a lonely, unfrequented or secluded place. The emphasis is on the opportunities a person has to avoid the sights, sounds, and evidence of other people within a particular area. Primitive and unconfined types of recreation are defined as those activities that provide dispersed, undeveloped recreation which do not require facilities or motorized equipment. In most cases, opportunities for solitude and primitive recreation go hand-in-hand, and both are dependent on naturalness. Wilderness areas must be managed to ensure that these opportunities are not degraded.

c. Special Features—Congress specified that wilderness areas "may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value." These are optional wilderness characteristics; an area may meet the Wilderness Act's definition of wilderness without having these special features, but they are usually present in wilderness areas, and in some cases they may be a prime reason for wilderness designation. Also, these features contribute to an area's opportunities for primitive recreation. Wilderness areas must be managed to ensure that these opportunities are not degraded.

In order to preserve these wilderness characteristics as Congress directed, the management of BLM-administered wilderness must be based on a *principle of nondegradation*. Under this principle, the central thrust of BLM wilderness management is to prevent degradation of natural conditions, opportunities for solitude or primitive recreation and special features.

It is recognized that there is often variation in the level of naturalness, solitude, types of primitive recreation, and special features, present within a wilderness—or between different wilderness areas. Also, different lands have different capabilities to sustain types and amounts of use. The principle of nondegradation means that wilderness areas will be managed to provide for the protection and perpetuation of the values of the wilderness resource and prevent deterioration caused by other resource activities or by visitor use, and, when necessary, to restore deteriorated sites to an acceptable condition.

Most uses will result in some changes in the condition of the wilderness resource. Some uses cause little or no change, while others have the potential for serious change. Therefore, it is necessary to define limits of acceptable change. This must be established using the conditions *generally* prevailing in each wilderness at the time of congressional designation as a benchmark unless there is unacceptable biological, physical, or social degradation present. This does not mean that existing human-caused impacts in some areas will set a standard, or a sort of "lowest common denominator", which other more natural areas will be allowed to reach. Managers must determine what human-caused changes can be allowed without causing degradation and what measures can be taken to bring situations below the limit of acceptable change back to an acceptable level. This may influence the ways in which recreational, scenic, scientific, educational, conservation, and historical uses, as well as nonconforming uses, are done in the area, so their impact on the wilderness resource can be kept within the limits of acceptable change.

In the case of some of the nonconforming uses, such as mining, provided for by Congress in the Wilderness Act and subsequent legislation, the condition of the wilderness resource may be degraded as a result of an allowed use. However, in such cases, the principle of nondegradation and the limits of acceptable change should be used as an analysis tool for the reasonable mitigation of impacts, consistent with the applicant's conduct of the allowed use, and as a standard for determining the condition to which the area will be returned where and when rehabilitation is appropriate.

In this document, the principle of nondegradation is reflected in the policies and guidelines for specific activities.

Two equivalent terms used many times in this document reflect the wilderness preservation concept—"preservation of wilderness character" and "protection of the wilderness resource."

2. **Wilderness Use Concept**

Section 4(b) of the Wilderness Act provides fundamental guidance on how wilderness areas shall be used, in these words:

> "Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character. Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use."

Wilderness areas are thus open to use and provide a variety of benefits to society. Use might be "on-site," taking direct advantage of the multiple resources of the area. Or the use and benefits may be derived "off-site," such as through enjoyment of the scenery at a distance from a nearby highway, through indirect benefits from the area's resources (i.e., water quality, wildlife, etc.), or just the knowledge that the area exists.

There is a limit to the extent to which such uses as recreation and education may take place within wilderness, because the Wilderness Act also says that they must occur in a manner so as to leave the wilderness unimpaired for future use and enjoyment as wilderness. Provision may be made for recreational, scenic, scientific, educational, conservation, and historical use of wilderness areas in ways that do not jeopardize the conditions of naturalness, the opportunities for solitude or a primitive and unconfined type of recreation, or the special features that existed at the time an area was designated as wilderness by Congress. All public use will be administered to ensure that the wilderness resource is kept unimpaired.

Public use for recreation purposes is generally a prevalent use of wilderness. However, the Wilderness Act makes it clear that recreation is only one of the purposes of the National Wilderness Preservation System. Sometimes there are places within wilderness where particularly sensitive values—such as colonial bird nesting sites—may dictate that recreation activities be restricted or entirely excluded.

Use capacity (recreational, historic, educational, etc.), based on social and ecological elements, will be established for each wilderness area, and will be considered in determining how much use to allow.

A second factor which may limit the use of wilderness has to do with the nonconforming use provisions of the Wilderness Act and subsequent legislation. In portions of a wilderness area where nonconforming activities such as mining and grazing are permitted, there may be instances when the public purposes listed in section 4(b) may be displaced either temporarily or permanently.

3. **Nonconforming But Accepted Use Concept** Congress specially provided for certain activities and existing uses which otherwise would have been prohibited in wilderness areas under the general management provisions of sections 2(a), 4(b) and 4(c). For a complete list of these nonconforming but accepted activities, refer to section I.B.; generally they are: existing private rights; aircraft and motorboats; control of fire, insects, and diseases; gathering of resource information; mining; grazing; water resource development; commercial recreation services; and access to non-Federal inholdings.

The FLPMA directs that all uses of the public lands be conducted so as to prevent unnecessary or undue degradation of the lands. In wilderness areas, this means that the BLM must manage the nonconforming but accepted uses described above so as to prevent unnecessary or undue degradation of the area's wilderness character. As on nonwilderness public lands, some of the nonconforming but accepted uses may be restricted or entirely excluded where particularly sensitive resource values occur or where the public interest would be better served by restricting or excluding them.

Chapter II. Management Policy for BLM-Administered Wilderness

The policy guidance in this chapter is followed in Chapter III by guidelines for specific activities, based on these policies and on their interaction with other applicable policies for the management of public lands. No policy document can address every potential situation. Managers must use their best judgment in applying these policies and guidelines to particular situations. In cases not covered by specific guidance, managers will resolve questions by testing alternative courses of action against the policies in this chapter to arrive at the alternative that is most consistent with the policy as a whole.

Uses and values will vary between wilderness areas and frequently vary among different parts of an individual wilderness. There may be wide differences in terrain and other geographic characteristics, climate, vegetation, and wildlife. Historical patterns of use, local customs, and the traditional attitudes of visitors also differ between and within wilderness areas. Consequently, activities that are accepted and management practices that are necessary and appropriate on one wilderness may be either unnecessary or unacceptable on others. While this may require some flexibility in the management and administration of the individual units of wilderness, all are part of one National Wilderness Preservation System and shall be consistently managed within the intent of the Wilderness Act.

This policy document prescribes the general objectives, policies, and specific activity guidance applicable to all BLM wilderness areas. Specific management objectives, requirements, and decisions implementing administrative practices and visitor activities in individual wilderness areas are developed and described in the wilderness management plan for each unit.

II. A. General Policy

1. The Department of the Interior's policy is to manage wilderness areas under the administration of the Bureau of Land Management so as to preserve their wilderness character, and to manage them for the use and enjoyment of the American people in a manner that will leave them unimpaired for future use and enjoyment as wilderness. The wilderness areas will be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.

2. The Department's policy is to allow the nonconforming but accepted uses specifically permitted in wilderness areas by the Wilderness Act and subsequent laws in a manner that will prevent unnecessary or undue degradation of the area's wilderness character.

3. The Department's policy is to manage BLM wilderness areas consistent with the policies above so as to augment multiple use management of adjacent and nearby lands through protection of watersheds and water yield, wildlife habitat, natural plant communities, and similar natural values.

II. B. Specific Policy Guidance

1. **Preservation of Wilderness Character.** BLM wilderness areas will be managed so as to be affected primarily by the forces of nature, with the imprint of human work substantially unnoticeable; so as to maintain the area's outstanding opportunities for solitude or primitive and unconfined recreation; and so as to protect any ecological, geological, or other features of scientific, educational, scenic, or historical value which the area may contain.

a. **Naturalness.** BLM will foster a natural distribution of native species of wildlife, fish, and plants by ensuring that natural ecosystems and ecological processes continue to function naturally. The BLM will minimize human influence on wildlife populations and work to prevent the extinction by human causes of plants and animals found in the areas. Hunting, fishing, and trapping will continue as authorized by State law, when carried out in a manner consistent with preservation of an area's wilderness character.

The BLM will allow fire, insects, and diseases to play a natural role in the wilderness ecosystem, except where these activities threaten human life, property, or high value resources on adjacent nonwilderness lands, or where these would result in unacceptable change to the wilderness resource. (The guidelines in Chapter III will indicate some types of unacceptable change.)

The BLM will keep watersheds, water bodies, water quality, and soils in a natural condition and will allow associated ecological processes previously altered by human influences to return to their natural condition.

The limits of acceptable change will be defined in the wilderness management plan for each wilderness area, and the BLM will endeavor to restore those sites which have dropped below this level.

b. **Solitude.** BLM will maintain and enhance the area's outstanding opportunities for solitude by providing natural settings with few reminders of human activity or civilization and by providing opportunities for relatively few contacts with other visitors.

c. **Special Features.** BLM will maintain unimpaired the ecological, geological, and other features of scientific, educational, scenic, or historical value found in BLM wilderness areas.

2. **Prohibition of Certain Uses**

Except where subject to existing private rights, where necessary to meet minimum requirements for the administration of the wilderness area for the purposes of the Act or as specifically provided for elsewhere in these policies, there shall be no temporary road, no use of motor vehicles, motorized equipment, or motor boats, no landing of aircraft, no other form of mechanical transport and no structure or installation within wilderness areas. There shall be no commercial enterprise or permanent road, except where subject to existing private rights or as specifically provided for in this policy.

3. **Minimum Tool**

Tools, equipment, or structures may be used for managment when they are the minimum necessary for protection of the wilderness resource or when necessary in emergency situations for the health and safety of the visitor. Management will use the *minimum* tool, equipment, or structure necessary to successfully, safely, and economically accomplish the objective. The chosen tool, equipment, or structure should be the one that least degrades wilderness values temporarily or permanently.

For the purpose of the above paragraph, accepted tools, equipment, and structures may include but are not limited to: fire towers, patrol cabins, pit toilets, temporary roads, spraying equipment, hand tools, fire-fighting equipment caches, fencing, and controlled burning. In special or emergency cases involving the health and safety of wilderness visitors, or the protection of wilderness values, aircraft, motorboats, and motorized vehicles may be used.

4. **Visitor Use.** BLM wilderness areas will be managed to provide for their use and enjoyment in ways that are consistent with preservation of their wilderness character and that will leave them unimpaired for future use and enjoyment as wilderness.

Visitor use may be related to any of the following public purposes: recreation, scenic, scientific, educational, conservation, and historical use.

Visitor use facilities may be installed if they are the minimum necessary for the health and safety of wilderness visitors, or for the protection of the wilderness resource. (See also "minimum tool," in section B.3. above.) Facilities that are solely for the convenience of the visitor are not compatible with preservation of wilderness character and therefore will not be provided in wilderness areas.

The use capacity of the wilderness area will be determined, and will be used by managers to anticipate and avert degradation of the area's wilderness character and as a basis for mitigating the impacts caused by various uses.

If visitor use threatens to impair the area's wilderness character, managers will take action to prevent impairment. Indirect methods of reducing visitors' impact, such as trail design, information, and education, will be preferred over direct (regulatory) methods, such as limits on party size, length of stay, or number of parties. In case of conflict between visitor uses that depend upon a wilderness setting and those that do not, the uses dependent upon a wilderness setting will be favored.

Visitor use in wilderness involves certain risks to the visitor as a consequence of isolation from the conveniences of a technological world. The visitor must accept these risks in entering a wilderness area. In emergencies involving the health and safety of persons within the area, managers will take appropriate measures, such as search and rescue operations.

5. **Nonconforming Uses.**

a. **Valid Existing Rights.** Private rights existing as of the date an area was designated as wilderness will be recognized. In some cases, such rights may involve activities addressed elsewhere in this document under standards prescribed by the Wilderness Act. (One example of this is valid mining claims, addressed in section (h).) Valid existing rights in situations not covered by these policies will be considered by the BLM on a case-by-case basis, in consultation with the Regional Solicitor, to determine the nature of the rights and the extent to which the BLM must regulate the exercise of those rights pursuant to the Wilderness Act and other laws.

b. **Aircraft and Motorboats.** Use of aircraft or motorboats may be permitted to continue in wilderness areas where such uses were established prior to the date the area entered the National Wilderness Preservation System. Such use, when permitted to continue, will be monitored on a regular basis to determine if its continuation is appropriate. Use may be regulated or discontinued as necessary to protect resources in the area or to preserve the area's wilderness character.

c. **Control of Fires, Insects, and Diseases.** Where fire, insects and diseases threaten human life, property, or high value resources on adjacent nonwilderness lands, or where they would cause unacceptable change to the wilderness resource, measures may be taken as necessary to control them. Allowable actions will be specified in the wilderness management plan for each wilderness area.

d. **Gathering Information About Resources.** Any activity, including mineral prospecting, for the purpose of gathering information about natural resources in wilderness, will be permitted provided it is carried on in a manner compatible with the preservation of the wilderness resource. (This section does not affect mineral prospecting activities conducted under the mining laws, which are covered in section (h) below. The Wilderness Act provides for these activities in wilderness areas until midnight December 31, 1983.)

(1) No form of overland mechanical transport may be used in connection with prospecting for minerals or any activity for the purpose of gathering information about individual resources, unless approved by the BLM in accordance with the regulations 43 CFR 2920 - Leases, Permits, and Easements (effective April 15, 1981) (published in 46 FR 5772).

(2) Any person desiring to use motor vehicles, motorized equipment, mechanized transport, or to land aircraft, for mineral prospecting or for gathering information about resources is required to notify the BLM in writing. Approval documents will assure activities are conducted in a manner compatible with the preservation of the wilderness resource. No degradation of wilderness resources or values will be allowed. Restoration of disturbed areas is required and must take place as soon as possible once activities terminate. Performance bonds may be required.

e. **Proposed Water Resource Facilities.** If the President authorizes new water resource facilities or activities, pursuant to section 4(d)(4)(1) of the Wilderness Act, the BLM will manage those authorized operations to prevent unnecessary or undue degradation of the area's wilderness character. (Existing water resource facilities are discussed in (f) below, and water facilities for livestock grazing are discussed in (g) below.)

f. **Existing Water Resource Facilities.** Some wilderness areas may contain minor water resource facilities that were found to be substantially unnoticeable in the area. If such structures are present and were explicitly recognized by Congress as being acceptable in a specific wilderness, they may be operated and maintained to keep them in an effective, usable condition. Maintenance may not change the location, size, or type of the facility, or increase the storage capacity of a reservoir.

g. **Livestock Grazing.** Grazing of livestock, where established prior to the effective date of the Act designating the area as wilderness, shall be permitted to continue subject to this policy and the BLM grazing regulations 43 CFR 4100. Existing grazing may include not only the utilization of the forage resource, but also the use and maintenance of livestock management improvements and facilities associated with the grazing activity at the time of designation and which are in compliance with an approved Allotment Management Plan.

Congressional guidelines regarding "Grazing in National Forest Wilderness Areas," published in House Report 96-1126, dated June 24, 1980, will be implemented in all BLM-administered wilderness with pre-existing grazing. These guidelines will be applied using the normal planning and environmental assessment process and will be integrated into all management plans for the wilderness area.

h. **Minerals Management.** Until midnight December 31, 1983, the United States mining laws and all laws pertaining to mineral leasing shall extend to BLM-administered wilderness areas to the same extent as applicable prior to the date the wilderness was incorporated into the National Wilderness Preservation System.

(1) **Mining Law Administration.** Holders of unpatented mining claims validly established on any BLM-administered wilderness prior to inclusion of such unit in the National Wilderness Preservation System are accorded the rights provided by the United States mining laws as then applicable to public land involved. Persons prospecting or locating mining claims in BLM-administered wilderness on or after the date on which the said unit was included in the National Wilderness Preservation System are accorded similar rights subject to the provisions of the Wilderness Act and subsequent establishing legislation. All claimants must comply with reasonable conditions for the protection of resources in accordance with the general purposes of maintaining the National Wilderness Preservation System unimpaired for future use and enjoyment of its wilderness character.

Timber on mining claims within BLM-administered wilderness may be cut only for the actual development of the claim or uses reasonably incident thereto. Any severance or removal of timber, other than that necessary to provide clearance, on the claim shall be in accordance with sound principles of forest management and shall be done in such a manner as to minimize adverse effects on the wilderness resource. In the development and operation of mining claims, claimants will be required to prevent erosion and the obstruction, pollution, or siltation of streams, lakes, or springs or deterioration of the land.

A bond as prescribed in 43 CFR 3809.1-9 may be required. All reasonable measures will be required of the operator to reclaim disturbed lands as soon as feasible after operations cease. Ordinarily, needed work will be accomplished within one year after operations cease, unless provided otherwise by the BLM. Whenever possible and feasible the objectives of reclamation shall be to restore the surface to a contour which appears to be natural, although this may not be the original contour. Where such measures are impractical or impossible, the objective shall be to provide for the maximum achievable slope stability. Reclamation shall in all cases include revegetation where feasible and practical. If revegetation by natural means will not occur in time to prevent serious soil loss or other damage to wilderness values, revegetation by planting may be required, with preference given to the use of native species, where practical and reasonable.

If an application for patent has been filed but not acted upon when the requirements of the immediately preceding paragraph would normally be invoked, the requirements will be suspended while the patent application is under consideration. However, those requirements for the prevention of erosion and pollution, siltation or obstruction of streams, lakes, or springs or deterioration of the land will continue to be observed.

The title to timber on patented mining claims validly established after the land was included in the National Wilderness Preservation System will remain in the United States, subject to a right of the patentee to cut and use timber. The patentee may cut and use as much of the mature timber as is needed in the extraction, removal and beneficiation of the mineral deposits, if needed timber is not otherwise reasonably available. The cutting shall comply with the requirements for sound principles of forest management as set forth in stipulations issued by the BLM.

In the development and operation of mining claims, claimants will be required to prevent unnecessary or undue degradation of the land.

(2) **Mineral Leasing.** Until January 1, 1984, all laws pertaining to mineral leasing will continue to apply in wilderness areas to the same extent they applied before the area was designated.

State Directors will make decisions on whether or not to issue mineral leases, permits, and licenses in wilderness areas. The State Director's decision to issue mineral leases will be made through the environmental assessment process and after consideration of what will best serve the public interest.

Reasonable stipulations for the protection of the wilderness character of the land will be incorporated into mineral leases, permits, and licenses covering lands within BLM-administered wilderness. Stipulations will be consistent with the use of the land for purposes for which they are leased, permitted, or licensed.

(3) **Common Varieties.** Permits shall not be issued for the removal of mineral materials commonly known as common varieties under the Materials Act of July 31, 1947, as amended and supplemented.

(4) **Withdrawal.** Subject to valid rights then existing, effective January 1, 1984, the minerals in lands designated as wilderness are withdrawn from all forms of appropriation under the mining laws and from disposition under all laws pertaining to mineral leasing, unless Congress specifically provides otherwise in the law designating the area as part of the National Wilderness Preservation System or in subsequent legislation.

i. **Commercial Services.** Commercial services such as those provided by packers, outfitters, and guides may be provided within wilderness areas to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.

j. **Access to Non-Federal Lands.** States or persons, and their successors in interest, who own land completely surrounded by a wilderness area shall be given such rights as may be necessary to assure adequate access to that land. Adequate access is defined as the combination of routes and modes of travel which will, as determined by the BLM, cause the least lasting impact on the wilderness resource, and at the same time serve the reasonable purposes for which the State or private land is held or used. No road shall be constructed across wilderness until authorized by the BLM. Access by routes or modes of travel not available to the general public may, when fully justified, be permitted by written authorization. The authorization will prescribe routes and modes of travel which will result in the least lasting impact on wilderness values and, at the same time, serve the reasonable purposes for which the land is held or used. A performance bond will usually be required (in accordance with Title V of the Federal Land Policy and Management Act).

Where the exercise of rights of access to surrounded State or private land would be detrimental to wilderness values, the BLM shall, before granting access, attempt to acquire such land by purchase or by exchange.

6. Existing Structures and Installations

After Congress has designated a wilderness area, an inventory will be made of existing structures and installations, critically evaluating the purposes and need for each, and its historical significance, if any. If a structure or installation has historical significance, it may be retained as a historic feature of the area. If it does not have historical significance, it may be maintained for continued use if it meets the "minimum tool" policy in paragraph 3 above, or if it is necessary for a use specifically permitted by the Wilderness Act or by the law designating the affected wilderness area. Any structure or installation that does not qualify for retention under the above criteria will be removed.

In maintaining or modifying existing structures and installations, the manager should consider the potential for using native materials and alternative technological approaches to make them as unobtrusive as possible.

7. Acquisition of Non-Federal Lands

Acquisition of non-Federal lands within wilderness areas is authorized by purchase or exchange. When such lands are to be acquired, the BLM will seek to acquire the mineral rights as well as the surface rights. Acquisition of privately-owned lands will occur only if the private owner concurs with the acquisition, or if the acquisition is specifically authorized by Congress to be accomplished by eminent domain.

8. Research and Collection of Management Information

Wilderness areas administered by BLM will provide opportunities for research and scientific activities that use wilderness areas for study of natural environments and ecosystems. Information collection activities by resource managers for wilderness and other purposes may also be conducted in wilderness. All research and collection of management information within the wilderness area will be conducted in an unobtrusive manner, by methods compatible with the preservation of the area's wilderness character. (Refer to section II. B. 5. d. for policy on gathering information about resources and section III. L. for specific policies on research.)

9. **Buffer Zones and Adjacent Lands**

No buffer zones will be created around wilderness areas to protect them from the influence of activities on adjacent land. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.

When activities on adjacent lands are proposed, the specific impacts on those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements, as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities.

10. **Visitor Information and Education**

Part of the wilderness experience valued by many visitors is the freedom from rules and regulations. Visitor education will be used to achieve management objectives where feasible. Only the minimum amount of regulation necessary to achieve desired objectives will be used.

To protect the natural appearance of wilderness areas, visitor informational and educational programs, signs, and poster boards will normally be located outside the wilderness boundary. An exception to this general rule is that informational or regulatory signs may be placed within wilderness areas as a management tool to correct specific problems and protect the wilderness resource or for the health and safety of visitors when these signs meet the "minimum tool" standard (see section II. B. 3.)

Informational and educational materials pertaining to the management of BLM-administered wilderness in general or to specific wilderness areas will be readily available to the wilderness user at BLM offices. Such materials will inform visitors of the responsibilities and risks involved in visiting a wilderness area.

11. **Administration**

a. **Wilderness Management Plans.** A wilderness management plan will be developed for each BLM-administered wilderness area as a means of applying the Wilderness Management Policy to that specific area. The plan will be tailored to the local conditions of each wilderness by prescribing any specific objectives appropriate to the area, consistent with the Wilderness Management Policy. Plans should consider the different kinds of environmental settings, history of use, and management situations pertaining to the individual wilderness area. The wilderness management plan will describe the strategy to be used to implement both the Wilderness Management Policy and the specific objectives prescribed for the area.

Management plans for individual wilderness areas should be flexible and must be updated periodically to reflect changes in conditions and use. New inventory data, use patterns, demand trends, supply conditions, management concerns, etc., may change over a period of time, and some goals and objectives applicable soon after a wilderness area is designated may not be appropriate further in the future. Managers should use the land management planning process to analyze all available options, so as to respond to changing conditions.

In developing wilderness management plans, the concept of stratification or zoning between wilderness areas or within individual areas should be considered as a means of achieving management objectives or providing different experiences and opportunities. For example, it may be desirable to manage one wilderness or a portion of an area within a wilderness primarily for protection of an endangered wildlife species. In another wilderness, managers may want to establish different zones of experience, providing recreational opportunities ranging from (1) high concentrations of use to (2) a series of more natural areas as one penetrates into the inner core, to (3) a pristine area which may have no trails or signs. Stratification or zoning can help the wilderness manager achieve objectives, protect resources, and satisfy user demands and expectations.

b. **Coordination.** When a wilderness area's boundaries overlap BLM administrative boundaries, management will be coordinated between District and State Offices to ensure uniformity in management practices.

When a wilderness area involves contiguous lands administered by BLM and by another Federal agency, the BLM will remain an active manager of lands under its administration, unless it has been determined that more effective wilderness management can be achieved by transferring the land to the other agency or by some form of cooperative management. State Directors have the option of approving cooperative management agreements with other Federal agencies on a case-by-case basis. Wherever appropriate, a joint management plan by all agencies involved will be encouraged.

Coordinated planning efforts will also involve State fish and wildlife agencies and all other Federal, State, county, and local agencies, Indian tribal governments, and organizations that may be affected by wilderness management activities.

c. **Wilderness Management Personnel.** Wilderness management personnel may be employed to help implement the provisions of a wilderness management plan. They can facilitate protecting the wilderness resource by assisting visitors with suggestions, advice, and information; enforcing regulations; performing minor trail repairs; and removing trash. Wilderness management personnel can reduce site-specific problems, such as the overuse of popular camp areas, by relocating camp sites and performing rehabilitation work. The manager may also use wilderness management personnel to gather information about resource trends and visitor use. The decision to employ wilderness management personnel should be made on a case-by-case basis. Their use may or may not be required, depending on local conditions. In cases where personnel are not employed specifically for wilderness management, the BLM will assign appropriate personnel as needed to monitor the condition of the wilderness resource.

Chapter III. Guidelines for Specific Activities

The guidelines in this chapter are an application of the policies set forth in Chapter II to various activities that may or may not take place in BLM-administered wilderness areas. These guidelines are also based on other applicable laws and on other policies and regulations of the Department of the Interior.

These guidelines will be used in developing a Wilderness Management Plan for each BLM-administered wilderness area, containing guidance on how specific activities will be treated in that area. Until such time as a Wilderness Management Plan is approved by the State Director, interim decisions on specific activities in a wilderness area will be made by BLM field officials based on these guidelines.

Decisions on any activities not addressed in these guidelines will be made on the basis of the policies in Chapter II.

III. A. Recreation and Visitor Use

Wilderness areas administered by the BLM shall provide a variety of uses including, but not limited to, recreational, scenic, scientific, educational, conservation, and historical.

The wilderness resource will be dominant in all management decisions where a choice must be made between preservation of wilderness character and visitor use. There are places and times within wilderness where unique values may require that recreation and visitor use activities be restricted or entirely prohibited in order to preserve an enduring resource of wilderness. The highest priority among various kinds of visitor use will be accorded those activities which (1) are most dependent upon the wilderness environment and cannot be reasonably accommodated outside of wilderness, (2) least affect the wilderness environment.

Consideration must be given to the ability of the wilderness resource to sustain visitor use without loss or degradation of the wilderness resource itself. Carrying capacity—social, biological, and physical—may vary widely within and between wilderness areas due to variations in types and amounts of uses, resource characteristics, and the capabilities of the resources to sustain different types and amounts of uses. The leading management tool and document to consider these factors and set guidelines for managing visitor use will be the Wilderness Management Plan. These plans will describe the level at which an area is able to absorb use and impacts and will describe measures needed to protect wilderness values.

The following specific guidance applies to visitor use within BLM wilderness:

1. **Visitor Management**

Visitor management techniques will be utilized in wilderness when necessary to preserve both the wilderness resource and the visitor's wilderness experience and opportunities. Management of visitor use will be the minimum necessary to provide for use of the area as wilderness, and to preserve the wilderness character of the area.

Visitor management should be planned to maintain a high-quality wilderness resource and to protect the quality of the wilderness experience. The Wilderness Management Plan will consider all appropriate and compatible methods to manage levels of use that are within the capacity of the wilderness. Visitor management may be carried out by both direct and indirect methods.

a. **Indirect Methods.** Visitor use may be managed through such indirect efforts as:

(1) Wilderness rangers informing visitors about less congested areas.

(2) Obliteration of improvements at overcrowded or undesirable sites.

(3) Improved access to tributary, lightly used areas.

(4) Information to (a) encourage use of lightly used or relatively unknown areas, or to (b) stress the experiences and value to be found outside the peak use period.

(5) Minimize the promotion of an outdoor experience in wilderness and emphasize such uses of undeveloped areas outside wilderness.

(6) Reroute primary transportation away from major destination areas. Have spur trails to vistas or camp areas.

(7) Design and management of trail-head areas, including access roads and parking areas.

(8) Education of visitors about good wilderness manners and ethics.

(9) Use of built-in frictions or obstacles, such as low-standard access roads.

(10) Removal of trail-head improvements and/or restriction of travel into areas already overused or where capacity use already occurs.

b. **Direct Methods.** More direct methods to achieve visitor management may include:

(1) Regulating the use of saddle horses and/or pack stock.

(2) Managing areas strictly for foot or horse use only, to protect sensitive sites and resources, or to provide different recreation opportunities or experiences within the wilderness.

(3) Requiring permits for specific areas or time periods. A permit or registration system can be an important tool for both the wilderness manager and wilderness visitor. Both systems provide visitor use data on the number and distribution of visitors. In addition, a permit or registration system can give the visitor site-specific information helpful in preplanning a trip. A permit system can be utilized also to limit or redistribute and disperse visitor use.

(4) Limiting the number of people in parties or the number permitted to stay overnight at specific locations.

(5) Limiting numbers of users. The Wilderness

Management Plan will analyze needed methods and identify necessary measures.

(6) Stock grazing or canoe/boat-beaching restrictions, both private and commercial, on over-used or concentration areas.

2. **Improvements and Facilities**

Facilities and improvements such as trails, bridges, signs, and campsites, will be provided only where they are the minimum necessary for protection of the wilderness resource and for the health and safety of persons within the area. No facilities or improvements will be provided for the comfort and convenience of the visitor. The need for proposed facilities, such as latrines, fire circles, and fences will be justified in the Wilderness Management Plan. Improvements and facilities when approved will be constructed of materials which harmonize with the natural environment.

Existing improvements or facilities not specifically provided for in these guidelines—those having no historical value and not necessary for preservation of an area's wilderness character or for the health and safety of persons within the area—will be removed.

Construction, maintenance, and removal of facilities and improvements will be by primitive means. Exceptions to this policy, such as using handpowered portable tools and aircraft, may be approved by the State Director if no other alternatives exist, the mechanized or mechanical equipment is the minimum necessary, and they will not degrade or impair the area's wilderness character.

a. **Trail Systems**

(1) New trails will be constructed only if they are needed to preserve wilderness values and resources and they will not significantly degrade the degree of naturalness or solitude in the area. Trails are an acceptable improvement provided they are constructed and maintained so they have an insignificant impact on wilderness values. Wilderness management plans will address where trails and related facilities are appropriate.

(2) Existing trails and trail systems will be evaluated to determine if they are the minimum necessary to meet wilderness management objectives. Trails may be expanded, relocated, restored, or closed as a result of the evaluation. Wilderness Management Plans will address the present situation and evaluate future needs. Trailhead access points will be evaluated at this time. Trailhead locations should be carefully chosen as they have a profound influence over management of visitor use. It may be desirable to locate trailhead access points well outside the wilderness boundary to reduce their impact upon the wilderness area.

(3) Trail routes shall be selected to provide scenic vistas and, where possible, a varied scene. Heavily used areas should generally be served by spur trails and should be bypassed by primary trails. Trails will not be constructed with treads of more than 24 inches in width except where a wider trail is justified for protection of the wilderness resource. Trails should follow natural contours where possible and result in minimum disturbance to soil and ground cover.

(4) Bridges will be designed and constructed so as to harmonize with the environment and will be the minimum size and complexity necessary to allow foot or stock use. Besides adhering to the basic standards set out for improvements and facilities above, bridges will be provided only:

(a) When no other route or crossing is reasonably available.

(b) Where the crossing, during the primary season of public use:

—Cannot be safely negotiated on foot.

—Cannot be safely forded by horses.

(c) Where less formal devices are frequently destroyed or damaged by flood water.

b. **Signing**

Only a minimum of signs will be provided for the visitor, in combination with availability of accurate maps, route descriptions, brochures, etc. Signs will be provided primarily for visitor safety and resource protection. Signs will not be placed within the wilderness for the convenience of the user.

(1) Signs may be erected at trail junctions, showing directions with arrows.

(2) Informational or interpretive signs will not be used to mark streams, lakes, mountain peaks, passes, or points of interest.

(3) Regulatory signs will be kept to the minimum necessary, and may be of materials other than wood. When regulatory signs are posted within a wilderness, notice pertaining to these regulations will also be posted at trailheads or major access points and published where feasible on brochures or maps or othewise made available to the user prior to entry into the wilderness.

c. **Use of Campsites**

(1) Campsites or camping areas may be designated if necessary for the purpose of wilderness resource protection. They will be located sufficiently distant from lakes, streams, trails, or other natural attractions as to allow appropriate use without unacceptable degradation of the focal point of public interest. Space between sites should be sufficient to ensure a reasonable degree of solitude and quiet. A "no-trace" camping concept will be promoted.

(2) Shelters or lean-tos will not be constructed, and existing shelters will be removed from within wilderness. Shelters or lean-tos determined to have historical value may remain, and their protection and use will be addressed in the Wilderness Management Plan.

(3) Garbage pits will not be permitted, and existing garbage pits will be closed. A "pack-it-in, pack-it-out" philosophy will be encouraged with visitors. Every practicable medium will be used to educate and inform the visitor on this point.

(4) Improvised camp structures constructed by visitors will not be permitted. They will be dismantled and obliterated when and where found.

(5) Hitchracks or corrals and other improvements to facilitate stock use may be used as necessary to prevent damage to the wilderness resource. They will be located away from main-traveled trails, streams, lakes, camping areas, and focal points of in-

terest, and will be constructed of materials which harmonize with the environment.

d. **Outfitter Camps**
The Wilderness Management Plan will carefully analyze the role of the outfitter-guide in a particular wilderness. Some wilderness areas may not be particularly suited to this kind of service due to size, shape, location, etc., or to the objectives for management of a particular wilderness. Also, the visitor-use capacity of the wilderness as well as public needs must be considered in making a decision to permit or not permit outfitter-guide services. If allowed, these services will be planned and administered to meet public needs while maintaining the wilderness resource. Operations will be so administered as to be harmonious with those of wilderness visitors who do not employ such services.

Outfitter-guide camps will be located off the primary trails or scenic spur trails and at sufficient distance from attractions to avoid conflicts with other visitors. The BLM will select the location of outfitter-guide campsites as necessary to protect wilderness resources and the wilderness experience of other visitors. Outfitter-guides will operate under special recreation permits, which will include stipulations for management of the use. The Wilderness Management Plan shall evaluate the need for temporary caches not involving erection of structures and shall designate their locations, if caches are to be approved.

3. **Fuelwood**
If campsites or cooking fires are permitted, fuelwood cutting should be limited to dead and down material. The use of portable cookstoves will be encouraged whenever possible. The Wilderness Management Plan will define any regulations or restrictions needed for wilderness resource protection.

4. **Contests**
Contests, such as physical or mental endurance of a person or animal; foot races; canoe or boat races; competitive trail rides; survival contests or exercises (including military); and other activities of this nature shall not be permitted in wilderness areas. These activities do not depend on a wilderness setting, and they cause impacts that degrade the wilderness character of the area, thus adversely affecting wilderness-dependent uses.

5. **Recreational or Hobby Mineral Collecting**
Recreational or hobby collecting of mineral specimens (rockhounding) will be allowed in wilderness. Such use will be limited to hand methods or detection equipment that does not cause surface disturbance, such as a metal detector or Geiger counter. In addition, methods shall not be permitted that in any way adversely affect or degrade the wilderness resource or the experiences of visitors in the area. (This paragraph does not cover mining claims, which are addressed in section III. I below.)

III. B. Cultural and Historic Resources

Archeological and historical sites and values are a unique and nonrenewable part of the wilderness resource. They are protected by provisions of the Uniform Rules and Regulations (43 CFR Part 3) to carry out the Antiquities Act of 1906, the Historic Sites Act of 1935, Executive Order 11593, the National Historic Preservation Act of 1966, as amended, and the Archeological Resources Protection Act of 1979. To the extent not inconsistent with the concept of wilderness preservation and the intent of the Wilderness Act, and objectives for cultural resource management, these resources are available for recreational, scenic, scientific, educational, conservation, and historical uses (including ceremonial or religious use by Native Americans).

Cultural resources, in most instances, will be subject to the forces of nature in the same manner as other wilderness resources. Study or management will not normally include any excavation, stabilization, or interpretation activities. Salvage, rehabilitation, stabilization, reconstruction, and restoration work on archeological and historic sites; excavation; and intensive inventories may be permitted on a case-by-case basis where the project will not degrade the overall wilderness character of the area and such activity is needed to preserve the particular resource. State Director approval is required for all such projects.

The National Historic Preservation Act and Executive Order 11593 require an inventory and evaluation of cultural resources. The evaluation study for National Register of Historic Places eligibility is made using criteria in 36 CFR 1202.6 and in consultation with the State Historic Preservation Officer (SHPO). Those cultural resources found to qualify are nominated to the National Register of Historic Places.

Those sites or structures that do not qualify for the National Register may be allowed to deteriorate naturally, or be removed or obliterated. However, some structures may qualify for retention as historic features or under the "minimum tool" policy (refer to section II. B. 3), or as facilities necessary for a use specifically permitted by the Wilderness Act or by the law designating the affected wilderness area.

Management direction for cultural resources that qualify for nomination to the National Register is subject to compliance with Section 106 of the National Historic Preservation Act and 36 CFR 800. A decision to remove, maintain, or allow historic or prehistoric structures to deteriorate naturally is a Federal undertaking which will affect the resources. In working through the compliance processes, a determination will be made as to what feasible and prudent alternatives exist to satisfactorily mitigate adverse effects of the proposed decision on the cultural resources. A Memorandum of Understanding will be developed with all consulting parties whenever an adverse effect determination is made (36 CFR 800). The range of alternatives might include recording to established standards (by drawings and photographs), salvage (by removing or dismantling), stabilizing, or restoration. Stabilization or restoration and subsequent maintenance may be considered for administrative structures that meet the "minimum tool" policy (refer to secton II. B. 3).

III. C. Forestry Resources

1. Cutting of Trees and Shrubs

Management of the forest cover will be directed toward retaining the primeval character of the environment and allowing natural ecological processes to operate freely. Trees, shrubs, and other vegetative products will not be sold or cut for nonwilderness purposes except under specified conditions set forth in these guidelines for valid mining claims and under emergency conditions such as fire, insect, and disease control.

2. Cutting of Trees for Administrative Purposes

Trees may be cut for use in the construction and maintenance of authorized improvements that are located within the wilderness when the necessary material cannot be reasonably obtained or brought in from outside the wilderness. Such cutting within the wilderness shall be done away from trails or campsites, and all evidence of the cutting shall be disposed of insofar as possible.

3. Cutting of Trees for Fuelwood

(Refer to section III. A. 3., Fuelwood, for specific guidance.)

4. Reforestation

Reforestation, in the absence of natural revegetation, will generally be prohibited, but in rare cases may be authorized by the Director to prevent deterioration or loss of the wilderness resource when the cause of the damage or loss is due to human activities and there is no reasonable expectation of natural reforestation. The natural processes of ecological succession will be the preferred method of site-restoration. When reforestation action is necessary, only native species and only primitive methods, such as hand planting, will be used.

III. D. Fish and Wildlife

Management will seek a natural distribution, number, and interaction of indigenous species of fish and wildlife. Natural processes will be allowed to occur in wilderness ecosystems, which include fish and wildlife populations, as far as possible without human influences. Management will protect the conditions that allow natural processes a maximum degree of freedom.

To the extent possible, wildlife species in BLM wilderness should be allowed to maintain a natural balance with their habitat and with each other. Wildlife may be harvested under State regulations, fisheries management will be consistent with preservation of the area's wilderness character, and direct fish and wildlife control measures will be applied only upon a showing of need under standards described below.

The BLM, in cooperation with State and Federal public health and fish and game officials, may make special exceptions, where necessary to control disease epidemics or other health hazards in which wildlife species are involved as carriers.

The basic responsibilities of the BLM and other cooperating State and Federal agencies in the management of fish and wildlife are not altered by the Wilderness Act. However, the constraints of the Act and the intent of the Congress articulated in the Act and in subsequent legislation will guide the management of wildlife in wilderness. Memoranda of Understanding will be developed with appropriate State game and fish agencies to clarify wildlife management jurisdictions. Wilderness Management Plans will specify wildlife habitat conditions to be maintained. Development of management plans will fully involve all Federal, State, and local agencies and organizations in the formation of management direction.

The preservation of sensitive, rare, threatened, and endangered species dependent on wilderness conditions will be favored.

The killing of native birds and mammals which are a natural component of the biotic community, but are not provided protection by State or Federal law, will be discouraged or controlled if necessary through public education and Memoranda of Understanding with State game and fish agencies.

1. Hunting and Fishing

Hunting and fishing are permitted in BLM-administered wilderness, subject to applicable State and Federal laws and regulations. Coordination with State game and fish agencies for the management of resident wildlife and fish species will be sought in order to ensure maintenance of the wilderness resource. Specific management criteria may be cited in Memoranda of Understanding and the Wilderness Management Plan.

2. Fish and Wildlife Habitat

The proper balance of fish and game animals with their habitat may be achieved by managing public hunting and fishing. Objectives for the management of fish and wildlife habitat are normally compatible with the objectives for maintaining general wilderness character, or careful planning usually can make them so. Where incompatible, the requirements for maintenance of wilderness values will be overriding.

Vegetative manipulation projects for fish and wildlife purposes may be approved by the State Director on a project-by-project basis if they do not degrade wilderness character, or if they correct conditions which are a result of human influence, or if the project will promote the perpetuation of a threatened or endangered species.

Habitat manipulation by chemical or mechanical means may only be approved on a project-by-project basis where necessary for threatened or endangered species, or to correct unnatural conditions resulting from human influence. Such activities will be allowed only where manipulation would enhance the wilderness resource and where natural processes have been unsuccessful. Hand or aerial seeding of native vegetation species may be permitted after disturbances, such as wildfire, to restore essential food plants to a wilderness where the natural process of healing is not expected to occur. Actions of this type will be allowed only to enhance wilderness values and not to optimize habitat needs of any single wildlife species to the detriment of wildlife diversity in an untrammeled environment.

Wildfire or prescribed burning may be used as a wildlife management tool if carefully designed to maintain or enhance the wilderness resource. Wildfire or prescribed burning is to be used only when the project can be accomplished without serious or long-lasting damage to watershed or the area's wilderness character. Prescribed burning will not be permitted to improve wildlife utilization. It may be done only for the following purposes:

a. It is needed to maintain the natural condition of a fire-dependent ecosystem or to re-introduce fire where past strict wildfire control measures have interfered with natural ecological processes.

b. A primary value of a given wilderness will be sustained as a result of the burning.

c. It will promote the perpetuation of a threatened or endangered species.

Additional specific guidelines on prescribed burning appear in section III. E, Fire Management.

The BLM may authorize State and Federal agencies to use temporary enclosures and facilities to trap or transplant wildlife as long as they are the minimum necessary to protect or maintain the wilderness resource.

Although construction of facilities to enhance an area's value for wildlife or fish is not consistent with the free operation of natural processes, there are situations where such measures may be necessary for the continued existence or welfare of wildlife or fish living in wilderness. This is particularly true in the case of species adversely affected through human activities in such areas. Certain permanent installations to maintain conditions for wildlife and fish, upon consideration of their design, placement, duration, and use, may be permitted if the resulting change is compatible with preservation of wilderness character and is consistent with wilderness management objectives for the area, and if the installations are the minimum necessary to accomplish the task. Permissible actions under these criteria may include: installations to protect sources of water on which wildlife depend, such as enclosures; and water sources such as springs, wells, and guzzlers. Fisheries activities may be permitted as long as their purpose is to protect natural conditions, restore deteriorated habitat, and maintain wilderness values.

3. Wildlife Manipulation

In some instances, wildlife species once native to the wilderness have been forced from their original habitat by the encroachment of human beings and human activities. To the extent that these factors can be altered or managed within the intent of the Wilderness Act, native species no longer established in the wilderness area may be reintroduced and managed as a part of the wilderness resource. Care must be exercised to be certain that the species is native. Such programs will be addressed in the wilderness management plan.

Management of established exotic species (e.g., chukar partridge, pheasant) not natural to an area may continue where they enhance the wilderness character of a particular wilderness. Introduction of new exotics will not be permitted. Coordination with State and Federal agencies should be established for control of undesirable exotic populations.

4. Fish Stocking

Fish-stocking programs needed to meet wilderness management objectives shall be developed in cooperation with the State agencies or the Fish and Wildlife Service and shall be coordinated with overall wilderness management objectives. The probability of increased visitor use at stocked waters and the full impact and effect of such use on the wilderness resource will be recognized and considered.

Memoranda of Understanding with State agencies should be developed to establish a stocking policy for each wilderness where stocking is permitted, as a basis for a stocking plan. Basic decisions will be spelled out in the wilderness management plan for each wilderness. Aerial stocking of fish by State agencies or the Fish and Wildlife Service may continue where this was an established practice prior to designation. Authorization will be on a case-by-case basis. Aerial stocking should be done outside of general visitor use seasons when possible. Wilderness management plans should contain all necessary justification, mitigation, and definition of planting programs.

Some general guides for fish stocking in BLM wilderness units are:

a. Native species should be favored in waters with a history of supporting such species. Species native to the vicinity or region may be considered as an alternative. Exotic fish will not be considered, except where such practice existed prior to wilderness designation and it meets wilderness management objectives.

b. Waters with established undesirable fish or where overpopulations of fish have occurred should be managed for fish best suited to the water under natural conditions, and to meet wilderness management objectives. Barren waters may be stocked only if the wilderness management plan defines the desirability of such an action. The scientific value of barren lakes will be considered prior to approval to stock.

c. Presently nonstocked waters which at one time supported a native fish population, and which would provide suitable habitat for native fish species that would enhance the wilderness experience of visitors, may be considered for stocking on a case-by-case basis.

d. In all fish-stocking activities, threatened or endangered species shall receive primary consideration.

5. **Trapping**
Trapping of furbearers, such as mink, marten, beaver, and muskrat, is a compatible wilderness use and will be allowed under State laws and regulations. Commercial trapping will not be permitted. Incidental trapping, if it is not the trapper's sole source of livelihood, is permitted.

6. **Rodents**
Rodents in BLM-administered wilderness areas shall be exempt from control programs, except where overpopulations pose a serious threat to other wilderness values or resources and property outside the boundaries of the wilderness. Control projects must be approved on a case-by-case basis.

7. **Predators**
Predacious animals are an important part of natural life systems within wilderness. They play an important role in the natural selection and survival processes, helping to maintain critical population balances of wild species. They should be able to survive and compete with other species, free from unregulated human interference and the traditional pursuit of sport or bounty. Where control of predators is necessary to protect threatened or endangered wildlife species or on a case-by-case basis to prevent special and serious losses of domestic livestock, it will be accomplished by methods which are directed at eliminating the offending individuals while at the same time presenting the least possible hazard to other animals or to wilderness visitors. Poison baits or cyanide guns are not compatible. Control programs will be carried out by or under the direction of the U.S. Fish and Wildlife Service (FWS), the BLM, or State agencies, and will be consistent with the Secretary of the Interior's policies on animal damage control and with the Memorandum of Understanding between the BLM and FWS. Programs will comply with BLM Animal Damage Control plans where these have been previously adopted. The State Director will approve predator-control programs on a case-by-case basis, and under such conditions as to ensure minimum disturbance to the wilderness resource and visitors.

Approval of predator control actions must be contingent upon a clear showing that the removal of the offending predators will not diminish the wilderness values of the area, because this kind of wildlife is an integral part of the wilderness, as well as an adjunct to the visitor's experience.

III. E. Fire, Insect, and Disease Management

1. **Fire Management**
a. **Overriding Fire Guidance**
All fires will be controlled to prevent loss of human life or property within wilderness areas or to prevent the spread of fire to areas outside of the wilderness where life, resources, or property may be threatened. Human-caused wildfires will be prevented and/or controlled unless the fire meets wilderness fire management objectives.
b. **Natural Fire**
Natural fire (i.e., lightning-caused) is normally a part of the ecology of the wilderness, and human efforts to ban this agent may have resulted in significant ecological changes in the flora and fauna of some areas. In order to return some wilderness ecosystems to a more natural state, it may be appropriate to allow natural fire to burn, but only in conformance with an approved Fire Management Plan and the overriding fire guidance in section (a) above.
c. **Prescribed Burning**
Where natural fire under prescription does not meet wilderness fire management objectives, prescribed burning with ignition by Bureau personnel may be allowed on a case-by-case basis for the following purposes:

(1) To reintroduce or maintain the natural condition of a fire-dependent ecosystem.

(2) To restore fire where past strict fire control measures had interfered with natural, ecological processes.

(3) Where a primary value of a given wilderness will be perpetuated as a result of the burning, or

(4) Where it will perpetuate a threatened or endangered species.

Prescribed fires will be allowed only in conformance with an approved Fire Management Plan. State Director approval is required.
d. **Removal of Evidence of Fire Control Activities**
Temporary fire camps, helispots, and other sites used for fire suppression or control activities shall be removed upon completion of use and the site rehabilitated to as natural a state as possible.
e. **Fire Detection**
Fire detection methods necessary to meet wilderness objectives will be used. Structures such as lookouts may be maintained or constructed if they are the minimum necessary to achieve wilderness management objectives and there is no other alternative detection method. Preference will be given to detection methods which have the least permanent impact on wilderness values, such as aircraft overflights and lookouts located outside the wilderness boundary.
f. **Pre-Suppression**
Pre-suppression activities may be allowed to meet wilderness management objectives and where necessary for the protection of the public health or safety. All pre-suppression programs will be addressed in the Fire Management Plan.
g. **Suppression**
Fire-suppression measures and techniques shall be used which achieve the wilderness management objectives with the minimum adverse impact on the wilderness resource. Preference shall be given to the methods and equipment which least alter the landscape or disturb the land surface. Structures and improvements shall be located outside the wilderness boundary, except those that are the minimum necessary to achieve wilderness management objectives.
h. **Fire Management Plans**
The following considerations will be covered in each Fire Management Plan: wilderness management objectives for the area, historic fire occurrence, natural role of fire, proposed degree of suppression, ex-

pected fire behavior, acceptable suppression techniques, smoke management, and effects on adjacent landowners. The plan will conform to criteria established by the BLM defining the limits of acceptable fire weather, fire behavior, and fire effects. Each Fire Management Plan will be written to conform to the Wilderness Management Plan (WMP) for the area it addresses and will become an addendum to the WMP upon approval.

2. Control of Insects and Diseases

Insect and disease outbreaks will not be artificially controlled, unless it is necessary to protect timber or other valuable resources outside of the wilderness area, or in special instances when loss to resources within a wilderness is undesirable (e.g., absence of control would threaten rare or endangered plants or animals). Such control measures will consist of the effective combination of actions which have the least adverse impact on the wilderness resource.

Special care must be taken when using chemicals or other artificial methods to control insect and disease outbreaks because of their possible adverse effect on the total biological community.

Insect or disease suppression projects in BLM wilderness must be approved by the Director.

III. F. Water Resource Management

1 Watershed Restoration

Watershed restoration may be undertaken where deteriorated soil and hydrologic conditions caused by human beings or human influences create a serious threat or loss of wilderness values; or where, even though not human-caused, these conditions present a definite hazard to life or property, or where such conditions could cause serious depreciation of important environmental quality outside the wilderness. Where such dangers are not imminent or where natural vegetation may be expected to return in a reasonable time, restoration work will not be done.

Re-establishment of vegetation as a watershed-restoration measure, where there is no reasonable expectation of natural healing, will be accomplished using native or naturalized species. Overland motorized equipment will not be used where more primitive equipment can accomplish the restoration objectives. Exceptions must be fully justified, based upon serious imminent threat to high downstream values. Approval by the Director is required for all watershed restoration proposals.

2. Water Improvements

a. Water-yield Improvements

Protection of wilderness values and management objectives generally preclude use of water-yield improvement techniques. Water-yield improvement prescriptions, if contemplated, must be clearly compatible with maintenance of the wilderness resource. The Director's approval is required for project approval.

b. New Water-Development Structures

The establishment of new water-regulating structures, power installations, and related improvements is subject to approval by the President. (Range and wildlife water-development structures are discussed under separate subheadings and are not subject to Presidential approval.)

The BLM's conclusions and recommendations in connection with proposals for new water-resource developments will be based upon comprehensive, factual information developed by an environmental analysis, and draft and final environmental impact statements, as prescribed by the National Environmental Policy Act. The final environmental impact statement requires the Director's approval. Any recommendation in favor of the proposal must be based upon a clear showing that the public values to be gained exceed the values that would be lost, and that the need cannot be met outside the wilderness. When a proposed structure is thus found to be in the public interest, consideration should also be given to a recommendation to exclude the applicable area from wilderness.

c. Existing Structures

Reservoirs, ditches, catchments, and related facilities for the control or use of water may have existed within BLM wilderness under valid permits or other authority prior to the area's designation as wilderness. These may be maintained if they are needed in the public interest, or are a part of a valid existing right.

Routine maintenance and repair of an existing structure which does not change the location, size or type, or increase the original intended storage capacity of a reservoir may be approved by the State Director. The operation, maintenance and repair of such facilities may include occasional motorized access where no other reasonable or practical alternatives exist.

Reconstruction of any structure or restoration of a natural body of water to its original or historic level must be approved by the State Director. Primitive means of transport and hand tools will be used wherever and whenever feasible.

Any proposal to increase the storage capacity of a reservoir, or replace a reservoir, which was not under a valid permit at the time the unit was incorporated into the National Wilderness Preservation System, will be considered as a new structure and subject to approval by the President.

The wilderness management plan should carefully evaluate each improvement to determine if the continuation of the use is needed in the public interest, or is part of a valid existing right. Maintenance needs and methods must be specifically stated if the improvement is to remain. If not, the improvement should be allowed to deteriorate naturally. When natural processes themselves cannot effectively and safely return the abandoned improvement back to a natural condition, restoration by other means may be used. Only hand labor and tools, and seeding with native or naturalized species may be permitted. All restoration projects are subject to approval by the State Director.

d. **Snow Measurement**
The measurement of snow within BLM wilderness is permitted under the following conditions:

(1) Measurement of snow will be accomplished by primitive means. If use of a helicopter was an established practice in measuring snow within an area prior to wilderness designation, that same use may be permitted. However, ways and means of eliminating the need will be explored.

(2) No new data sites can be established unless they are parts of projects approved by the President under provisions of Section 4(d)(4) of the Wilderness Act. Use of existing data sites may continue until adequate correlation can be established with data sites outside the wilderness. Installation of automated equipment (sensing devices, data collection platforms, etc.) may be permitted on a temporary basis at existing data sites to accelerate the development of correlations with data sites outside the wilderness. Access will be by primitive means except as specifically provided for in (1) above.

(3) Only miniaturized and unobtrusive types of equipment may be installed, and must be camouflaged to blend with the terrain as much as possible. Practices such as burying equipment and using antennae which can be removed during nonuse periods, will be used to minimize the visual impacts of the data site.

e. **Water Quality**
Maintaining or enhancing water quality is of high priority in management of the wilderness resource. Water quality monitoring instruments and hydrometeorological devices may be permitted if these are the minimum necessary for protection of the wilderness resource. All instruments and devices must be miniaturized and unobtrusive. No motorized vehicles will be permitted for installation, maintenance, or monitoring and surveillance.

f. **Weather Modification Over Wilderness**
Use of lands within the National Wilderness Preservation System as target areas for weather modification activities will not be approved unless the following conditions are met:

(1) The proponent can provide reasonable, scientifically supportable assurance that the activities will not produce permanent, substantial changes in natural conditions.

(2) The proposal does not include any feature that might reasonably be expected to produce conditions incompatible in appearance with the wilderness environment or reduce its value for recreation, scenic, scientific, education, conservation, or historical use.

The effects of weather modification activities may be permanent or temporary depending upon the type, duration, and degree of change in weather brought about by that activity.

Generally, short-term weather-modification activities, which will produce only occasional, incidental, temporary, or transitory changes in the weather with carryover effects on the ground lasting only a few days beyond the actual seeding period, can be permitted over wilderness because little or no permanent, identifiable ecological or physical impact is likely. Conversely, long-term weather modification programs, which will produce a repeated or prolonged change in the weather during any part of successive years, are likely to have a direct and often substantial impact in terms of ecological and physical effects. Even though the human contribution to these impacts on the ecology and physical conditions on the ground may be obscured by the fact that the activities are carried on outside or above the wilderness, they nevertheless can be recognized to be the result of human activities and therefore cannot be permitted where they will directly affect wilderness areas.

State Directors will gather necessary information relative to items 1 and 2 and make recommendations to the Director on any activity or application. The Director will approve activities or installations relative to weather modification affecting wilderness.

III. G. Air Quality

Under the Clean Air Act (as amended, 1977), BLM-administered lands were given Class II air quality classification, which allows moderate deterioration associated with moderate, well-controlled industrial and population growth. The BLM will manage designated wilderness areas as Class II unless they are reclassified by the State as a result of the procedures prescribed in the Clean Air Act (as amended, 1977).

According to the Clean Air Act, air quality reclassification is the prerogative of the States. The States must follow a process mandated by the Clean Air Act Amendments of 1977, involving a study of health, environmental, economic, social, and energy effects, a public hearing, and a report to the Environmental Protection Agency.

Administrative actions within wilderness areas will comply with the air quality classification for that specific area.

III. H. Rangeland Management

1. **Livestock Grazing Operations**
Section 4(d)(4)(2) of the Wilderness Act provides for continued livestock grazing where established prior to designating the area as wilderness. The objective of livestock management in wilderness is:

> Utilize the forage resource in conformity with established wilderness objectives for each area and the BLM grazing regulations (43 CFR 4100), and through practical, reasonable, and uniform application of the congressional guidelines and policy.

Further insight on the subject is in the Conference Report on S.2009 (House Report 96-1126) under the heading "Grazing in National Forest Wilderness Areas." These congressional guidelines and policy are to be considered in the overall context of the purposes and direction of the Wilderness Act and will be applied nationwide. They are reprinted here verbatim as an excerpt from House Report 96–1126:

Grazing in National Forest Wilderness Areas
Section 4(d)(4)(2) of the Wilderness Act states: "the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture."

The legislative history of this language is very clear in its intent that livestock grazing, and activities and the necessary facilities to support a livestock grazing program, will be permitted to continue in National Forest wilderness areas, when such grazing was established prior to classification of an area as wilderness.

Including those areas established in the Wilderness Act of 1964, Congress has designated some 188 areas, covering lands administered by the Forest Service, Fish and Wildlife Service, National Park Service and Bureau of Land Management as components of the National Wilderness Preservation System. A number of these areas contain active grazing programs, which are conducted pursuant to existing authorities. In all such cases, when enacting legislation classifying an area as wilderness, it has been the intent of the Congress, based on solid evidence developed by testimony at public hearings, that the practical language of the Wilderness Act would apply to grazing within wilderness areas administered by all Federal agencies, not just the Forest Service. In fact, special language appears in all wilderness legislation, the intent of which is to assure that the applicable provisions of the Wilderness Act, including Section 4(d)(4)(2), will apply to all wilderness areas, regardless of agency jurisdiction.

Further, during the 95th Congress, Congressional committees became increasingly disturbed that, despite the language of section 4(d)(4)(2) of the Wilderness Act and despite a history of nearly 15 years in addressing and providing guidance to the wilderness management agencies for development of wilderness management policies, National Forest administrative regulations and policies were acting to discourage grazing in wilderness, or unduly restricting on-the-ground activities necessary for proper grazing management. To address this problem, two House Committee on Interior and Insular Affairs Reports (95-620 and 95-1321) specifically provided guidance as to how section 4(d)(4)(2) of the Wilderness Act should be interpreted. This guidance appeared in these reports as follows:

> Section 4(d)(4)(2) of the Wilderness Act states that grazing in wilderness areas, if established prior to designation of the area as wilderness, "shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture". To clarify any lingering doubts, the committee wishes to stress that this language means that there shall be no curtailment of grazing permits or privileges in an area simply because it is designated as wilderness. As stated in the Forest Service regulations (36 CFR 293.7), grazing in wilderness areas ordinarily will be controlled under the general regulations governing grazing of livestock on National Forests....This includes the establishment of normal range allotments and allotment management plans. Furthermore, wilderness designation should not prevent the maintenance of existing fences or other livestock management improvements, nor the construction and maintenance of new fences or improvements which are consistent with allotment management plans and/or which are necessary for the protection of the range.

Despite the language of these two reports, RARE II hearings and field inspection trips in the 96th Congress have revealed that National Forest administrative policies on grazing in wilderness are subject to varying interpretations in the field, and are fraught with pronouncements that simply are not in accordance with Section 4(d)(4)(2) of the Wilderness Act. This had led to demands on the part of grazing permittees that section 4(d)(4)(2) of the Wilderness Act be amended to clarify the intentions of Congress. However, because of the great diversity of conditions under which grazing uses (including different classes of livestock) are managed on the public lands, the Conferees feel that the original broad language of the Wilderness Act is best left unchanged. Any attempts to draft specific statutory language covering grazing in the entire wilderness system (presently administered by four separate agencies in two different Departments) might prove to be unduly rigid in a specific area, and deprive the land management agencies of flexible opportunities to manage grazing in a creative and realistic site specific fashion.

Therefore, the conferees declined to amend section 4(d)(4)(2) of the Wilderness Act, agreeing instead to reaffirm the existing language and to include the following nationwide guidelines and specific statements of legislative policy. It is the intention of the conferees that the guidelines and policies be considered in the overall context of the purposes and direction of the Wilderness Act of 1964 and this Act, and that they be promptly, fully, and diligently implemented and made available to Forest Service personnel at all levels and to all holders of permits for grazing in National Forest Wilderness areas:

1. There shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly "phase out" grazing. Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be made as a result of revisions in the normal grazing and land management planning and policy setting process, giving consideration to legal mandates, range condition, and the protection of the range resource from deterioration.

It is anticipated that the numbers of livestock permitted to graze in wilderness would remain at the approximate levels existing at the time an area enters the wilderness system. If land management plans reveal conclusively that increased livestock numbers or animal unit months (AUMs) could be made available with no adverse impact on wilderness values such as plant communities, primitive recreation, and wildlife populations or habitat, some increases in AUMs may be permissible. This is not to imply, however, that wilderness lends itself to AUM or livestock increases and construction of substantial new facilities that might be appropriate for intensive grazing management in non-wilderness areas.

2. The maintenance of supporting facilities, existing in an area prior to its classification as wilderness (including fences, line cabins, water wells and lines, stock tanks, etc.), is permissible in wilderness.

Where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment. This may include, for example, the use of backhoes to maintain stock ponds, pickup trucks for major fence repairs, or specialized equipment to repair stock watering facilities. Such occasional use of motorized equipment should be expressly authorized in the grazing permits for the area involved. The use of motorized equipment should be based on a rule of practical necessity and reasonableness. For example, motorized equipment need not be allowed for the placement of small quantities of salt or other activities where such activities can reasonably and practically be accomplished on horseback or foot. On the other hand, it may be appropriate to permit the occasional use of motorized equipment to haul large quantities of salt to distribution points. Moreover, under the rule of reasonableness, occasional use of motorized equipment should be permitted where practical alternatives are not available and such use would not have a significant adverse impact on the natural environment. Such motorized equipment uses will normally only be permitted to those portions of a wilderness area where they had occurred prior to the area's designation as wilderness or are established by prior agreement.

3. The replacement or reconstruction of deteriorated facilities or improvements should not be required to be accomplished using "natural materials", unless the material and labor costs of using natural materials are such that their use would not impose unreasonable additional costs on grazing permittees.

4. The construction of new improvements or replacement of deteriorated facilities in wilderness is permissible if in accordance with those guidelines and management plans governing the area involved. However, the construction of new improvements should be primarily for the purpose of resource protection and the more effective management of these resources rather than to accommodate increased numbers of livestock.

5. The use of motorized equipment for emergency purposes such as rescuing sick animals or the placement of feed in emergency situations is also permissible. This privilege is to be exercised only in true emergencies, and should not be abused by permittees.

In summary, subject to the conditions and policies outlined above, the general rule of thumb on grazing management in wilderness should be that activities or facilities established prior to the date of an area's designation as wilderness should be allowed to remain in place and may be replaced when necessary for the permittee to properly administer the grazing program. Thus, if livestock grazing activities and facilities were established in an area at the time Congress determined that the area was suitable for wilderness and placed the specific area in the wilderness system, they should be allowed to continue. With respect to areas designated as wilderness prior to the date of this Act, these guidelines shall not be considered as a direction to re-establish uses where such uses have been discontinued.

It is also the understanding of the conferees that the authorizing Committees intend to closely monitor the implementation of the guidelines through subsequent oversight hearings to insure that the spirit, as well as the letter, of the guidelines are adhered to by the Forest Service. Of course, the inclusion of these guidelines in this Joint Statement of Managers does not preclude the Congress from dealing with the issue of grazing in wilderness areas statutorily in the future.

This concludes the excerpt from House Report 96-1126.

a. **Management Plans**

The above congressional guidelines and policies will be applied in accordance with the environmental analysis process. Management prescriptions will be determined through the BLM resource management planning process and implemented by the allotment management plan.

Planning for livestock grazing operations in designated wilderness will be through the normal BLM resource management planning processes.

(1) Resource management plans establish:

(a) Objectives and prescriptions for management of wilderness. These are based on resource inventory data which includes, but is not limited to, ecosystem identification, rangeland conditions, existing uses, and areas of existing or potential conflict.

(b) Use levels of the rangeland resource and its relationship with other uses.

(2) Allotment management plans, within the direction established by the resource management plan, prescribe:

(a) The manner and extent to which livestock grazing will be conducted to meet wilderness objectives, rangeland resource needs, desired conditions of ecosystems, and other resource values.

(b) Direction and scheduling for accomplishing goals and objectives on individual allotments, including the development of rangeland improvement schedules and grazing system to be followed.

b. **Permits.**

Grazing operations within wilderness areas will be authorized by grazing permits. Permits for livestock operations will be issued only in areas where grazing was established at the time the wilderness was designated.

c. **Rangeland Analysis**

(1) Rangeland analysis in wilderness areas will follow the normal BLM standards.

(2) The development of the allotment management plan will determine the need for and standards of rangeland improvements and will prescribe the grazing system to be followed.

Where an approved allotment management plan exists at the time an area is designated as wilderness, it will be reviewed in context with the congressional guidelines and policy. Necessary modification will be integrated into the resource management plan and the allotment management plan.

Allotment management plans for allotments partially or entirely within designated wilderness will specifically identify the following:

(a) The use of motor vehicles, motorized equipment or other forms of mechanical equipment including: specific equipment, where it is to be used, when it is to be used, and what it is to be used for.

(b) Rangeland improvement structures and installations to be maintained, constructed, or reconstructed in achieving rangeland management objectives, including maintenance standards.

(c) The means to handle emergencies. In bonafide emergencies or urgent situations, decisions will be based on consideration of all relevant factors and use of good judgment.

d. **Rangeland Improvements.**

The following criteria should be considered in determining the use of motor vehicles, motorized equipment or mechanical transport in constructing, maintaining or applying rangeland improvements and practices.

(1) Minimizing threat to or loss of property.

(2) Minimum use of motorized equipment within wilderness.

(3) Develop and manage the rangeland resource in a cost-effective manner.

(4) Achieve least amount of impact by nonconforming uses on wilderness values through:

(a) Scheduling during periods of low use.

(b) Harmonizing improvements to surrounding landscape.

(c) Locate improvements to achieve maximum screening and fully utilize natural feature opportunities.

(5) Type of practice or construction material.

(6) Timeliness, including frequency and time of year.

(7) Need to deal with emergency or urgent situations that develop through acts of nature, such as drought, heavy snow.

(8) Location of nearest ranch facilities in relation to the project.

(9) Availability of primitive transport, e.g., team and wagon, saddle and pack stock, etc.

(10) Length of time to complete a project by alternative methods.

(11) Availability of temporary camp and feed sites.

(12) Age and health factors of permittee.

Documentation of the environmental analysis which considers the authorization of rangeland improvement construction and/or maintenance, and the use of motor vehicles, motorized equipment, and mechanical transport shall be made in an environmental assessment.

e. **Structural Rangeland Improvements**

Rangeland improvement alternatives will be developed and evaluated through the environmental analysis process, including consultation with grazing permittees and other interested publics. Alternatives which utilize a practical and reasonable approach to meet rangeland and wilderness management objectives will be selected.

Permit modifications for the construction of new rangeland improvements or replacement of existing rangeland improvements will be made in accordance with BLM grazing regulations. Special consideration will be given to construction standards and techniques to achieve the most practical and reasonable approach considering the wilderness resource. Specific consideration will be given to:

- Costs of using natural materials.
- Alternative means of construction which harmonize to the extent possible with the wilderness resource.
- Use of motor vehicles, motorized equipment or mechanical transport needed for construction of improvements.

All rangeland improvements will be listed in the allotment management plan along with maintenance schedules.

(1) **Maintenance.**

The maintenance of existing necessary rangeland improvements may be allowed to continue. Those determined unnecessary through an environmental analysis will be phased out and removed on an agreed upon schedule.

The techniques by which maintenance of rangeland improvements and other related grazing activities are performed will require careful study, consideration of options, and a practical and reasonable solution. Existing use and requests for new use of motor vehicles, motorized equipment or other forms of mechanical transport, including emergencies, will be reviewed and congressional grazing guidelines applied. The occasional use of motor vehicles, motorized equipment or mechanical transport may be permitted where practical alternatives are not available.

The guidelines address occasional use of motor vehicles, motorized equipment, or mechanical transport where practical alternatives do not exist, with application only to those portions of a wilderness where they occurred prior to wilderness designation. It is important to look at all options and their impacts. Good judgment will be necessary in the decisionmaking process.

(2) **New Improvements.**

The construction of new rangeland improvements is permissible if determined to be necessary for the purpose of resource protection (rangeland and/or wilderness) and the effective management of these resources, rather than to accommodate increased numbers of livestock. The rangeland analysis may indicate that a reduction of use is necessary for rangeland protection, or new rangeland improvements are necessary for improved management or protection of wilderness values. New improvements will not be justified solely on the basis that they will aid intensive management resulting in increased grazing.

(3) **Types of Materials.**

When permitted, new or existing improvements should be of materials which harmonize with the wilderness character of the area to reduce the impact of artificial objects on the natural environment. Natural (native) materials for improvements will be used unless costs are unreasonable or they do not harmonize with the wilderness.

When replacement of an existing range improvement is contemplated, the following will be considered:

(a) The necessity of the rangeland improvement for livestock grazing operations, resource protection, or enhancement of wilderness values. Some improvements may no longer be needed or should be relocated. Existing rangeland improvements may be necessary for management of the rangeland and wilderness resources. Other alternatives for meeting needs will be explored.

(d) Design, location, and type of materials feasible to serve the purpose and yet be harmonious with natural features of the wilderness will be considered. A steel post and wire fence may be less obtrusive than native pole fence. A redwood water trough may be less noticeable than a steel one. A windmill may better harmonize with wilderness values than an earthen stock pond.

(c) Material and labor costs for natural materials vs. artificial materials. Good judgment, in consultation with permittees, will provide the basis for determining what is reasonable for the permittee's livestock grazing operation and the particular wilderness values involved.

f. **Non-Structural Rangeland Improvements**
Non-structural rangeland improvement practices can be approved where they were part of the management at the time the wilderness was established and where their continuance is necessary to maintain livestock grazing operations. The need for non-structural rangeland improvements and practices will be carefully analyzed using the following criteria:

(1) **Seeding.**
The need for seeding will be carefully analyzed. Seeding will be approved only for:

(a) Areas where human activities have caused the loss or threaten the existence of indigenous species.

(b) Areas where human activities have denuded or caused loss of soil, providing the actions or activities responsible for the deterioration have been corrected and natural vegetation is insufficient and ineffective.

(c) Maintenance of livestock grazing operations where seeding was practiced prior to the designation of wilderness. Species seeded will be those that are native or naturalized to the area. Seed will be broadcast, except in special situations where other seeding methods are necessary.

(2) **Plant Control.**
Plant control will be approved only for:

(a) Native plants when needed to maintain livestock grazing operations where practiced prior to the designation of wilderness.

(b) Noxious farm weeds by grubbing or with chemicals when they threaten lands outside wilderness or are spreading within the wilderness, provided the control can be effected without serious adverse impacts on wilderness values.

(3) **Irrigation.**
Artificial irrigation or water spreading will be done only to maintain livestock grazing operations where practiced prior to the designation of wilderness.

(4) **Fertilizing.**
Fertilization may be used only as an aid to revegetation of disturbed areas approved in item (1) or to maintan livestock grazing operations where practiced prior to the designation of wilderness. Liming will be considered a fertilization practice.

(5) **Prescribed Burning.**
Prescribed burning will be approved for rangeland management purposes only where it was practiced prior to the designation of wilderness and is necessary to achieve maintenance of livestock grazing operations; such use must be approved in a fire management plan. (Prescribed burning may be permitted for other purposes, under guidelines in section III. D. 2. and III. E. 1 of this document, such as in cases where reestablishment of natural fire regimes is desired. Rangeland management objectives may be achieved through such prescribed burns and through management of natural fire as prescribed in fire management plans.)

2. **Recreational Livestock**
Commercial recreational livestock, such as that used by packers and outfitters, will be grazed under permit. Noncommercial recreational livestock may also be subject to permit when necessary for the administration or protection of the wilderness. All recreational livestock users, including commercial outfitters, will be required to pack in feed for their domestic animals when it is determined that adequate forage is not available within the area to be visited. The Wilderness Management Plan will analyze the need for regulations or restrictions relating to recreational saddle and pack stock; including, but not limited to, hobbling rather than tethering of horses, restrictive zoning, horse-party size limits, and use of native feed or pellets.

3. **Wild Horses and Burros**
The Wild Free-Roaming Horse and Burro Act of 1971 declares that wild horses and burros "...are to be considered in the area where presently found, as an integral part of the natural system of the public lands."

Viable, healthy populations of wild horses and burros will be maintained in wilderness areas at levels determined appropriate by the BLM planning system. Herd numbers and management techniques will not degrade, and will be compatible with preservation of, the area's wilderness character.

Herd Management Area Plans (HMAP's) will be developed in wilderness areas containing wild horses or burros. The plans will detail the present condition and potential of the herd and herd management area. The plans will describe management actions required to meet the wilderness objectives as well as the herd needs. The HMAP's will establish the habitat requirements and any necessary improvements; herd structure (sex and age ratios, etc.); methods of population manipulation and control (including removal, if necessary); migratory habits; and projections of population changes over time. Monitoring studies for the herd and its habitat will be an integral part of the plan. The HMAP's will describe the physical improvements necessary for maintenance of healthy, viable herds and their habitat.

Use of motorized and mechanical equipment, including aircraft; use, maintenance and type of material, and equipment such as temporary corrals; and the location, frequency, and timing of such uses will be specified in HMAP's and wilderness management plans. Such uses will be allowed when no other alternatives exist, they are the minimum necessary to accomplish the task, and they are the least degrading of wilderness values temporarily or permanently. Use of these facilities and equipment require State Director approval.

Environmental assessments will analyze the impacts of the management prescribed by the HMAP's, and alternatives and mitigating measures to minimize those impacts upon the wilderness resource.

III. I. Minerals Management

1. Mining Law Administration

The Wilderness Act of 1964 provides the basis for the minerals management policy to be followed in approving minerals exploration and development in designated wilderness areas. The Act recognizes the rights of the mining claimant under the mining laws and provides for prospecting and mining in wilderness while providing for protection of the wilderness resource. Under the Wilderness Act, the mining laws shall, to the same extent as applicable prior to the designation of an area as wilderness, apply until midnight December 31, 1983. Thereafter, subject to valid rights then existing, the lands are withdrawn from all forms of appropriation under the mining laws. Therefore, BLM's policy on mining operations on unpatented mining claims will comprise two categories: those operations occurring on or before midnight December 31, 1983, and those operations occurring after midnight December 31, 1983, which may proceed because they qualify as valid existing rights as of that date.

a. Plans of Operations

(1) Whether or not the operations occur before or after midnight December 31, 1983, an approved plan of operations called for by 43 CFR 3809 is required in all BLM-administered wilderness areas. The plan of operations will include all access, functions, work, facilities, and activities in connection with prospecting, development, extraction, and processing of mineral deposits and all other uses related to these activities whether on or off a mining claim. All BLM officials involved must ensure that provisions approved in operating plans protect the rights of the operator while minimizing the impact on the wilderness resource. Operators must be allowed to carry out operations that are necessary and reasonably incidental to the mining operation, but may not, in any circumstance, cause unnecessary or undue degradation. District Managers may call for the expertise of all necessary specialists to ensure that both the wilderness and the rights of the operator are adequately and properly served.

Before approving the plan the BLM may assist the operator in selecting the most appropriate means and type of access and access route. The final approved access must be that which creates the least lasting impact on the wilderness resource, while still reasonably serving the needs of the operator.

Those activities otherwise generally prohibited in wilderness, including the use of mechanical transport, motorized equipment, or aircraft, shall be authorized only when there is no reasonable alternative. An approved operating plan will serve as authorization for such otherwise prohibited activities on mining claims within wilderness.

Casual use permissible in wilderness areas consists of operations resulting in only negligible disturbance to wilderness resources and not involving the use of mechanical or motorized equipment, landing of aircraft, or explosives. Examples of casual use would be: access by foot or horseback, or overflights to conduct magnetic surveys. Flights used to transport equipment or personnel into and out of the wilderness will not be considered as casual use. An approved plan of operations is not required for casual use.

(2) Contents of a plan of operations and plan approval procedures shall comply with the 43 CFR 3809 regulations. The following criteria shall also be satisfied:

(a) Operations Prior to Midnight December 31, 1983.

Until this deadline, lands within wilderness areas are open to appropriation under the mining laws to the same extent as before wilderness designation. In other words, claim staking, prospecting, exploration, development, and patenting may occur. Before approving operations submitted in a plan of operations during this time, the District Manager shall be satisfied that:

i. There will be no unnecessary or undue degradation of wilderness character.

ii. If mechanical or motorized equipment, including helicopter and fixed wing aircraft (beyond casual use), will be used, there is no reasonable alternative.

iii. The reclamation measures included in the plan of operations are adequate to provide for resotration as near as practicable of the surface of the land disturbed.

Any disapproval or denial of a plan of operations by the authorized officer is subject to appeal by the operator under the provisions of 43 CFR 3809.4.

(b) Operations After December 31, 1983

Development work, extraction, and patenting will be allowed to continue after midnight December 31, 1983, only on valid claims located on or before that date. After that date, prospecting and exploration work under the mining laws will not be allowed, as the right to continue those kinds of operations terminated on midnight December 31, 1983.

Prior to approving plans submitted after December 31, 1983, for operations on claims, or allowing operations to continue that had been approved prior to midnight December 31, 1983, the District Manager shall cause an examination of the unpatented claim(s) by a BLM minerals examiner to verify whether or not a valid claim exists. Operations on producing mines will be allowed to continue pending determination of valid existing rights. The minerals examination and subsequent minerals report must confirm that as of midnight December 31, 1983, minerals had been found and the evidence is of such a character that a person of ordinary prudence would be justified in the further expenditure of his labor and means, with a reasonable prospect of success in developing a valuable mine. Any disapproval or denial of a plan of operations by the authorized officer is subject to appeal by the operator under the provisions of 43 CFR 3809.4.

Before approving a plan of operations applicable after December 31, 1983, the District Manager shall be satisfied that:

i. There will be no unnecessary or undue degradation of wilderness character.

ii. If mechanical or motorized equipment, including helicopter and fixed wing aircraft (beyond casual use), will be used, there is no reasonable alternative.

iii. The reclamation measures included in the plan of operations are adequate to provide for restoration as near as practicable of the surface of the land disturbed.

(c) **Timber**—Timber determined necessary for removal to facilitate mining activities will be cut following principles of sound forest management and in such a manner as to minimize lasting evidence of its removal. Individual trees will be carefully selected so as not to make obvious artificial openings. Stumps will be cut as close to the ground as practical.

(d) **Fire**—The operator will be required to keep spark arresters and fire extinguishers on all internal combustion engines during periods of fire danger. The operator will generally be required to maintain caches of handtools in sufficient quantities to equip those personnel expected to be on the operation. The operator and his personnel will be expected to take initial action on any fire in the vicinity of the operation.

Slash and other flammable debris will generally require complete disposal to reduce fire hazard, prevent insect buildup, and more rapidly reduce evidence of the timber cutting. If burning is performed it will be in accordance with a prescribed burn plan that establishes fire and resource management objectives. Burning will be performed at a time approved by the BLM District Manager.

(e) **Site Reclamation**—The reclamation of the site and other disturbed areas will vary with the location, type of soil erosion hazard, type of vegetative cover, and type and extent of disturbance. As a minimum, all sites will be treated in such a manner that they will not cause accelerated erosion, siltation of streams, a hazard to wilderness visitors, or unnecessary or undue degradation of the land. Also, as a minimum, all excavations with vertical cuts in soil will be sloped to a stable angle of repose. Generally, hand-dug pits or shafts with the excavated material still at hand will be refilled. Here, as with timber cutting, the main objective will be to minimize remaining evidence of human activities. It may not be practical to return an area to its original contour, but it will generally be entirely reasonable to return it to a contour which might appear to be natural. An effort will be made when practical and reasonable to put topsoil equal in quality to that which was removed over disturbed soil surfaces to promote natural revegetation or to aid in seeding. Where native seed is available and its use is reasonable, disturbed areas will be seeded to native plant species provided the area originally supported such vegetation.

(f) **Structures and Improvements**—Plans of operations shall identify all structures and improvements planned as an adjunct to the operation. The plan will also show the ultimate disposition of the improvements and when this will occur. The objective will be to ensure the removal of all works or improvements when they are no longer needed for the prospect or future mining.

(g) **Unnecessary or Undue Degradation**—A plan of operations shall include measures to be taken to prevent unnecessary or undue degradation of the area resulting from the proposed operation. This may require measures to prevent water pollution through contamination or siltation of streams while the operation is in progress and to leave the site in such a condition that a vegetative cover can be reestablished when the operation is abandoned. Such measures may include trenching of disturbed slopes, placing retaining walls to prevent tailings from entering stream channels, etc. It may also require the scalping and stockpiling of the topsoil or sod from the area to be disturbed so that it might be spread over the surface to aid in reestablishing vegetation. Air and noise pollution are also critical elements. Plans shall identify mitigating measures to minimize noise and air pollution.

b. **Performance Bond**

No bond shall be required for operations considered as casual use. A bond may be required for any operator who conducts operations under an approved plan of operations. The primary purpose for a bond is to ensure compliance with the plan of operations. Requirement for posting a bond is at the discretion of the authorized officer.

c. **Environmental Assessment**

Operating plans for prospecting and mining activities will normally involve surface disturbance of the wilderness resource and will require an environmental assessment which considers the impact of the proposed operation on the lands and all feasible alternatives for complying with the rights of the claimant. Upon completion of the analysis, the District Manager will determine if no environmental impact statement is needed. The State Director's approval is required for preparation of an environmental impact statement.

2. **Mineral Leasing**

Section 4(d)(3) of the Wilderness Act of 1964 prescribes that mineral exploration and development will continue in designated wilderness areas by stating "until midnight December 31, 1983, the United States mining laws and all laws pertaining to mineral leasing shall, to the same extent as applicable prior to the effective date of this Act, extend to those . . . lands designated by this Act as 'wilderness areas'".

Designation of an area as wilderness may not be the basis for denying a mineral lease, permit, or license. Mineral leasing applications will be evaluated through the environmental assessment process. A State Director's determination to deny an application must be based upon background data and facts of record indicating the public interest would be better served by the rejection so as to protect other resource values. Wilderness character may be taken into account when making mineral leasing decisions, but leases or permits may not be denied solely on the basis of a desire to protect wilderness character. Leases, permits, or licenses issued after an area is designated as wilderness and prior to midnight December 31, 1983, must contain reasonable stipulations for the protection of the wilderness character of the land consistent with the use of the lands for the purposes for which they are leased, permitted, or licensed.

Mineral leases, permits, or licenses confer certain rights upon individuals to conduct certain activities upon the public lands. Regulations imposed on existing lessees, permittees, or licensees must be reasonable and consistent with the continued use of the lands for the purposes for which the leases, permits or licenses were issued.

Geothermal leasing is within the scope of the "laws pertaining to mineral leasing" in section 4(d)(3) of the Wilderness Act. Designated wilderness areas will remain available for geothermal leasing to the same extent they were at the time of designation, and the above guidelines on mineral leasing will apply.

3. Mineral Patents

A patent conveying both surface and mineral rights may be issued on a valid claim located *prior* to the date the area was included as a part of the National Wilderness Preservation System and prior to midnight December 31, 1983.

Mining locations shall be held and used solely for mining. For a valid claim located *after* the date an area is established as wilderness and prior to midnight December 31, 1983, the patent conveys title to mineral rights only. The patentee may cut and use so much of the mature timber from the claim as may be needed in the extraction, removal, and beneficiation of the mineral deposits, if the timber is not otherwise reasonably available. All timber shall be cut under sound principles of forest management. All surface rights are reserved to the United States. Except as specifically provided in the Wilderness Act or the act designating the area as wilderness, no use of the surface of the claim or its resources not reasonably required for carrying on mining or prospecting shall be allowed.

No patent shall issue after December 31, 1983, except for the valid claims existing on or before midnight December 31, 1983.

Once a claim has been patented it becomes private land or interest in lands. Access will then not be governed by a plan of operations, but under the policy in section III. B. 5. j.

4. Common Varieties of Mineral Materials

Permits to remove such materials will not be issued.

5. Paleontological Resources

To the extent not inconsistent with the concept of wilderness preservation and the intent of the Wilderness Act, paleontological resources are available for recreational, scenic, scientific, educational, conservation, and historical uses. Paleontological resources, in most instances, will be subject to the forces of nature in the same manner as other wilderness resources. Study or management will not normally include any excavation, stabilization, or interpretation activities. Salvage of paleontological sites, excavation, and collection of artifacts may be permitted on a case-by-case basis where the project will not degrade the overall wilderness character of the area and such activity is needed to preserve the particular resource. State Director approval is required for all such projects.

III. J. Administrative Structures and Facilities

1. Administrative Sites

Existing administrative sites will be limited to the existing structures or their replacement with similar structures of compatible design provided their continued use is necessary to meet minimum requirements for the administration of the area. Tents will usually be used to supplement housing and kitchen demands brought about by special projects and expanding workloads. As maintenance becomes impractical, first consideration will be given to eliminating the site. Replacement of facilities will require the Director's approval. The Wilderness Management Plan will address the need for existing sites. No new sites will be planned unless they are the minimum necessary for management of the area as wilderness.

2. Fences

Corrals and fences for the control of administrative pack and saddle stock may be built only at administrative sites where the animals are regularly used for periods of more than a few days' duration. New permanent fences shall be constructed of materials compatible with the particular wilderness. The Wilderness Management Plan will consider the need for, location of, and material to be used in administrative fence construction.

3. Trails

Trails for administrative purposes may be constructed when they are the minimum necessary for the preservation of the wilderness resource and have been authorized in the Wilderness Management Plan. (Trails and associated structures for visitor use are discussed as part of the specific guidance under Recreation and Visitor Use, section III. A. of this document.)

4. Airfields

New airfields, including emergency airstrips, shall not be located in BLM-administered wilderness. The Wilderness Management Plan shall review existing airstrips and determine whether or not to permit the continued use of existing airfields. Such use will be monitored on a regular basis to determine if its continuation is appropriate. Use may be restricted when necessary to protect wilderness resources, such as wildlife values during nesting season. If use is approved, maintenance will generally be by primitive, non-motorized equipment only.

5. Heliports and Helispots

a. Heliports

Heliports may be constructed and maintained at existing administrative sites where they are the minimum necessary for wilderness purposes. Complete justification for continuing heliports or constructing new ones will be required. Unless otherwise approved by the Director, other heliports shall not be located within wilderness areas. The Wilderness Management

Plan will fully evaluate the need for heliports. Only those heliports considered the minimum necessary for wilderness resource management will be continued.

b. **Helispots**
State Directors may approve construction of individual helispots or systems of helispots when they are the minimum necessary for administration or protection of the area as wilderness. The Wilderness Management Plan will fully evaluate helispot needs. Except for emergencies, helispot construction is prohibited if not specifically identified in the Wilderness Management Plan.

6. **Communication Facilities**
Communication facilities will be constructed and maintained only when they are the minimum necessary for administration and protection of the area as wilderness. The Wilderness Management Plan will fully evaluate the need for existing and proposed sites and their maintenance. Facilities should blend with the natural environment.

7. **Structures and Facilities Constructed, Used or Proposed by Other Agencies**
Other agencies conducting activities within BLM wilderness shall be equally constrained by provisions of the Wilderness Act that are applicable to the BLM. These guidelines will apply:

a. Authorized structures, installations, or facilities used by other agencies shall be reviewed periodically to determine whether their continued existence is essential for meeting the minimum requirements for administration of the area as wilderness. If it is not, the authorization shall be terminated and the improvement removed. The Wilderness Management Plan will assess and determine the disposition of all such improvements.

b. When existing improvements deteriorate to the point that normal maintenance will not suffice to keep them usable, the necessity for such improvements shall be critically analyzed. If they are not essential to meet the minimum requirements of administration of the wilderness, or essential to a continuing program that was established on the basis of the structure, they shall not be replaced. Permits for new improvements or replacement of existing improvements must be approved by the Director.

c. The maintenance or replacement of existing signs, instruments, and other improvements of a minor nature, used in connection with such projects as snow surveys, water measurement, game and fish management, and geological studies may be approved by the State Director. New installations may be approved if they are essential to meet the minimum requirements for administration of the wilderness for the purposes of the Wilderness Act.

III. K. Use of Motorized and Mechanical Equipment

Travel within a BLM-administered wilderness will normally be by non-motorized, non-mechanical means consistent with the preservation of wilderness character.

The wilderness management plan will specify the instances and places in which administrative use of mechanized equipment, mechanical transport, or aircraft is the minimum necessary to protect and administer the wilderness resource or is necessary as part of a nonconforming, but accepted, use. Where approved, that equipment which is the minimum necessary to accomplish the task with the least lasting and damaging impact on the wilderness resource will be selected. Such motorized and mechanical equipment use will be scheduled at times and locations which will have the least impact on the visitors' wilderness experience.

Conditions under which use may be allowed (unless otherwise stated, all use is subject to the standards spelled out in the preceding paragraph) are:

1. The public use of aircraft or motorboats, where these uses were established prior to the area's designation as wilderness, may be permitted to continue. Wilderness Management Plans will assure periodic review of such use to determine if its continuation is necessary and impacts on the area's wilderness character are minimized.
2. Motorized and mechanical equipment use may be authorized for mining or prospecting purposes if approved in a Plan of Operation or in association with valid existing rights. Refer to specific guidance for Minerals Management in section III. I.
3. The use of motor vehicles, motorized equipment, and mechanical transport may be approved for certain situations involving established livestock grazing operations. Refer to specific guidance for Rangeland Management in section III. H.
4. Motorized equipment and mechanical transport use may be allowed when an emergency condition exists which involves the health and safety of visitors. The District Manager (or Area Manager, if delegated) may approve such action.
5. Motorized equipment and mechanical transport may be permitted during a fire suppression emergency. Impacts resulting from overland vehicle travel (either cross-country travel or temporary road construction) and impacts from equipment use will be obliterated and rehabilitated in a manner which permits the wilderness resource an opportunity to heal rapidly. Motorized equipment and mechanical transport uses will be specifically addressed in a wilderness area's Fire Management Plan. The District Manager (or Area Manager, if delegated) may approve such action. Refer to specific guidance for Fire Management.
6. The use of aircraft may be allowed in nonemergency situations to deliver supplies or materials to construct or maintain improvements needed for administration of the area as wilderness when use of pack and saddle stock or other non-mechanized means is not feasible. Approval must be authorized by the State Director.
7. Powered hand-portable tools, such as chain saws or rock drills, may be approved by the State Director when they are the minimum necessary for administrative purposes where work cannot be accomplished with nonpowered tools. (In some cases, such tools

may be necessary in trail construction and maintenance, due to limitations of time, season, etc.)

8. Mechanized or motorized equipment may be used for wilderness research, other wilderness-enhancing purposes where no other alternatives exist and where such use is the minimum necessary for administration of the area as wilderness and will not degrade the area's wilderness character. Instances could include wildlife transplants or fish stocking by State Divisions of Wildlife. State Director approval is required. (Refer also to specific guidance for Research and Studies.)

9. Mechanized or motorized equipment may be used in gathering information about resources, so long as the use is compatible with preservation of the wilderness environment. Instances could include mineral surveys by the U.S. Geological Survey or water resource investigations. State Director approval is required.

10. Where feasible, control of insects and disease will be conducted without use of motorized equipment. Otherwise, aircraft use is permissible without landing of aircraft. Approval must be authorized by the State Director on a case-by-case basis.

11. Motorized equipment necessary to meet temporary emergencies involving violations of criminal law and/or including the pursuit of fugitives may be approved by the District Manager (or Area Manager, if delegated).

12. There is no specific prohibition of overflight of wilderness by aircraft. Low-flying aircraft cause disturbance of the solitude of an area. Except in bona fide emergencies, such as search and rescue efforts and essential military missions, low flight should be discouraged. Where low overflight is a problem, or expected to become a problem, wilderness management plans will provide for liaison with proper military authorities, the Federal Aviation Administration, and contact with pilots in the general area in an effort to reduce low flight.

III. L. Research and Studies

Research is a valid and important use of the wilderness resource. Research will be permitted and encouraged as long as all projects are conducted in such a manner as to preserve the area's wilderness character and they further the management, scientific, educational, historical, and conservation purposes of the area.

Research will be conducted or supported to evaluate the effectiveness in achieving objectives of ongoing wilderness management. Research will also be encouraged to identify problems and improve management techniques to increase efforts to further the purposes of the Wilderness Act.

Research and studies to investigate scientific values may also be conducted in wilderness provided that wilderness is essential to results of such research, and wilderness values would not be jeopardized.

Research and other studies will be conducted without use of motorized equipment or construction of temporary or permanent structures. Exceptions to this policy may be approved by the State Director in projects that are essential to management of the specific wilderness when no other feasible alternatives exist. Such use, when approved, must be the minimum necessary and must not degrade the area's wilderness character.

Chapter IV. Implementation of the Wilderness Management Policy

This chapter explains how the BLM will implement the Wilderness Management Policy through the process of developing a plan for each wilderness area under its administration.

The purpose of the Wilderness Management Plan (WMP) is to describe the management strategy that will be used to work toward attainment of the objectives of the Wilderness Management Policy. The plan must clearly show the actions that will be taken to preserve the wilderness resource, and the linkage between these actions and the objectives.

Each WMP will address the management situation present in an individual wilderness area or in two or more closely related areas. Plans should reflect the different kinds of environmental settings, history of use, and management situations found in individual areas within the framework of this policy.

Public involvement must be included in the development of each WMP. A minimum of at least one meeting or workshop must be open to the general public, and the public must be given at least 45 days to comment upon the proposed Wilderness Management Plan. Issues, questions, and problems raised by the public will be considered during the development of the final WMP. The WMP's will be updated on a regular basis or as conditions change. The public will be given the opportunity to be involved in plan changes.

The Wilderness Management Plan will include the general policy for all BLM wilderness areas. Additions may be made to tailor the policy to the current management situation for each area. Selected statements from the Wilderness Management Policy may be included to show the connection between actions proposed in the Plan and the objectives found in the management policy. Other policy statements may be included where appropriate, so long as they do not conflict with the Wilderness Management Policy.

During the time period before a WMP is prepared for a wilderness area, the Wilderness Management Policy will guide the conduct of day-to-day activities. The approval of activities, programs, or projects initiated by the Bureau of Land Management, other governmental bodies, or private individuals will be contingent upon the completion of an environmental assessment. Proposals determined to be inconsistent with the intent of the Wilderness Management Policy or other elements of the BLM's legislative and regulatory mandate will be modified or disapproved, as appropriate.

Upon completion of the WMP for an area, the viability of activities, programs, or projects will be determined through the BLM's environmental assessment process. If the proposed action is part of an approved WMP, the environmental assessment will consider if it is the best way to meet objectives of the plan from an on-the-ground perspective and if the action conforms to other applicable elements of the BLM's legislative and regulatory mandate. If the proposal is not part of the WMP, the environmental assessment will be used also to determine if it is in conformance with the WMP. Proposals found to be inconsistent with the WMP or other applicable BLM guidance will be modified or disapproved, as appropriate.

The BLM will issue any regulations necessary to manage visitor use and other problems peculiar to a particular wilderness area. Regulations might cover such topics as camping, river running, use of firewood, etc. Managers should use the minimum amount of regulation necessary, but should not hesitate when a problem calls for them.

Specific guidance regarding the procedure for developing Wilderness Management Plans will be issued to BLM field offices after issuance of the final Wilderness Management Policy.

APPENDIX A

Section 603 of THE FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976

(P.L. 94-579)

Sec. 603. (a) Within fifteen years after the date of approval of this Act, the Secretary shall review those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964 (78 Stat. 890; 16 U.S.C. 1131 et seq.) and shall from time to time report to the President his recommendation as to the suitability or nonsuitability of each such area or island for preservation as wilderness: *Provided,* That prior to any recommendations for the designation of an area as wilderness the Secretary shall cause mineral surveys to be conducted by the Geological Survey and the Bureau of Mines to determine the mineral values, if any, that may be present in such areas: *Provided further,* That the Secretary shall report to the President by July 1, 1980, his recommendations on those areas which the Secretary has prior to November 1, 1975, formally identified as natural or primitive areas. The review required by this subsection shall be conducted in accordance with the procedures specified in section 3(d) of the Wilderness Act.

(b) The President shall advise the President of the Senate and the Speaker of the House of Representatives of his recommendations with respect to designation as wilderness of each such area, together with a map thereof and a definition of its boundaries. Such advice by the President shall be given within two years of the receipt of each report from the Secretary. A recommendation of the President for designation as wilderness shall become effective only if so provided by an Act of Congress.

(c) During the period of review of such areas and until Congress has determined otherwise, the Secretary shall continue to manage such lands according to his authority under this Act and other applicable law in a manner so as not to impair the suitability of such areas for preservation as wilderness, subject, however, to the continuation of existing mining and grazing uses and mineral leasing in the manner and degree in which the same was being conducted on the date of approval of this Act: *Provided,* That, in managing the public lands the Secretary shall by regulation or otherwise take any action required to prevent unnecessary or undue degradation of the lands and their resources or to afford environmental protection. Unless previously withdrawn from appropriation under the mining laws, such lands shall continue to be subject to such appropriation during the period of review unless withdrawn by the Secretary under the procedures of section 204 of this Act for reasons other than preservation of their wilderness character. Once an area has been designated for preservation as wilderness, the provisions of the Wilderness Act which apply to national forest wilderness areas shall apply with respect to the administration and use of such designated area, including mineral surveys required by section 4(d)(2) of the Wilderness Act, and mineral development, access, exchange of lands, and ingress and egress for mining claimants and occupants.

APPENDIX B

THE WILDERNESS ACT OF SEPTEMBER 3, 1964

Public Law 88-577
88th Congress, S. 4

AN ACT

To establish a National Wilderness Preservation System for the permanent good of the whole people, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SHORT TITLE

Section 1. This Act may be cited as the "Wilderness Act".

WILDERNESS SYSTEM ESTABLISHED—STATEMENT OF POLICY

Section 2.(a) In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this prupose there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as "wilderness areas", and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness; and no Federal lands shall be designated as "wilderness areas" except as provided for in this Act or by a subsequent Act.

(b) The inclusion of an area in the National Wilderness Preservation System notwithstanding, the area shall continue to be managed by the Department and agency have jurisdiction thereover immediately before its inclusion in the National Wilderness Preservation System unless otherwise provided by Act of Congress. No appropriation shall be available for the payment of expenses or salaries for the administration of the National Wilderness Preservation System as a separate unit nor shall any appropriations be available for additional personnel stated as being required solely for the purpose of managing or administering areas solely because they are included within the National Wilderness Preservation System.

DEFINITION OF WILDERNESS

(c) A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

NATIONAL WILDERNESS PRESERVATION SYSTEM—EXTENT OF SYSTEM

Section 3.(a) All areas within the national forests classified at least 30 days before the effective date of this Act by the Secretary of Agriculture or the Chief of the Forest Service as "wilderness", "wild", or "canoe" are hereby designated as wilderness areas. The Secretary of Agriculture shall—

(1) Within one year after the effective date of this Act, file a map and legal description of each wilderness area with the Interior and Insular Affairs Committees of the United States Senate and the House of Representatives, and such descriptions shall have the same force and effect as if included in this Act: *Provided, however,* That correction of clerical and typographical errors in such legal descriptions and maps may be made.

(2) Maintain, available to the public, records pertaining to said wilderness areas, including maps and legal descriptions, copies of regulations governing them, copies of public notices of, and reports submitted to Congress regarding pending additions, eliminations, or modifications. Maps, legal descriptions, and regulations pertaining to wilderness areas within their respective jurisdictions also shall be available to the public in the offices of regional foresters, national forest supervisors, and forest rangers.

Classification. (b) The Secretary of Agriculture shall, within ten years after the enactment of this Act, review, as to its suitability or nonsuitability for preservation as wilderness, each area in the national forests classified on the effective date of this Act by the Secretary of Agriculture or the Chief of the Forest Service as "primitive" and report his findings to the President.

Presidential recommendation to Congress. The President shall advise the United States Senate and House of Representatives of his recommendations with respect to the designation as "wilderness" or other reclassification of each area on which review has been completed, together with maps and a definition of boundaries. Such advice shall be given with respect to not less than one-third of all the areas now classified as "primitive" within three years after the enactment of this Act, not less than two-thirds within seven years after the enactment of this Act, and the remaining areas within ten years after the enactment of this Act.

Congressional approval. Each recommendation of the President for designation as "wilderness" shall become effective only if so provided by an Act of Congress. Areas classified as "primitive" on the effective date of this Act shall continue to be administered under the rules and regulations affecting such areas on the effective date of this Act until Congress has determined otherwise. Any such area may be increased in size by the President at the time he submits his recommendations to the Congress by not more than five thousand acres with no more than one thousand two hundred and eighty acres of such increase in any one compact unit; if it is proposed to increase the size of any such area by more than five thousand acres or by more than one thousand two hundred and eighty acres in any one compact unit the increase in size shall not become effective until acted upon by Congress. Nothing herein contained shall limit the President in proposing, as part of his recommendations to Congress, the alteration of existing boundaries of primitive areas or recommending the addition of any contiguous area of national forest lands predominantly of wilderness value. Notwithstanding any other provisions of this Act, the Secretary of Agriculture may complete his review and delete such areas as may be necessary, but not to exceed seven thousand acres, from the southern tip of the Gore Range-Eagles Nest Primitive Area, Colorado, if the Secretary determines that such action is in the public interest.

Report to President. (c) Within ten years after the effective date of this Act the Secretary of the Interior shall review every roadless area of five thousand contiguous acres or more in the national parks, monuments and other units of the national park system and every such area of, and every roadless island within, the national wildlife refuges and game ranges, under his jurisdiction on the effective date of this Act and shall report to the President his recommendation as to the suitability or nonsuitability of each such area or island for preservation as wilderness.

Presidential recommendation to Congress. The President shall advise the President of the Senate and the Speaker of the House of Representatives of his recommendation with respect to the designation as wilderness of each such area or island on which review has been completed, together with a map thereof and a definition of its boundaries. Such advice shall be given with respect to not less than one-third of the areas and islands to be reviewed under this subsection within three years after enactment of this Act, not less than two-thirds within seven years of enactment of this Act, and the remainder within ten years of enactment of this Act.

Congressional approval. A recommendation of the President for designation as wilderness shall become effective only if so provided by an Act of Congress. Nothing contained herein shall, by implication or otherwise, be construed to lessen the present statutory authority of the Secretary of the Interior with respect to the maintenance of roadless areas within units of the national park system.

Suitability. (d)(1) The Secretary of Agriculture and the Secretary of the Interior shall, prior to submitting any recommendations to the President with respect to the suitability of any area for preservation as wilderness—

Publication in Federal Register. (A) give such public notice of the proposed action as they deem appropriate, including publication in the Federal Register and in a newspaper having general circulation in the area or areas in the vicinity of the affected land;

Hearings. (B) hold a public hearing or hearings at a location or locations convenient to the area affected. The hearings shall be announced through such means as the respective Secretaries involved deem appropriate, including notices in the Federal Register and in newspapers of general circulation in the area: *Provided,* That if the lands involved are located in more than one State, at least one hearing shall be held in each State in which a portion of the land lies;

(C) at least thirty days before the date of a hearing advise the Governor of each State and the governing board of each county, or in Alaska the borough, in which the lands are located, and Federal departments and agencies concerned, and invite such officials and Federal agencies to submit their views on the proposed action at the hearing or by no later than thirty days following the date of the hearing.

(2) Any views submitted to the appropriate Secretary under the provisions of (1) of this subsection with respect to any area shall be included with any recommendations to the President and to Congress with respect to such area.

Proposed modification. (e) Any modification or adjustment of boundaries of any wilderness area shall be recommended by the appropriate Secretary after public notice of such proposal and public hearing or hearings as provided in subsection (d) of this section. The proposed modification or adjustment shall then be recommended with map and description thereof to the President. The President shall advise the United States Senate and the House of Representatives of his recommendations with respect to such modification or adjustment and such recommendations shall become effective only in the same manner as provided for in subsections (b) and (c) of this section.

USE OF WILDERNESS AREAS

Section 4. (a) The purposes of this Act are hereby declared to be within and supplemental to the purposes for which national forests and units of the national park and national wildlife refuge systems are established and administered and—

(1) Nothing in this Act shall be deemed to be in interference with the purpose for which national forests are established as set forth in the Act of June 4, 1897 (30 Stat. 11), and the Multiple-Use Sustained-Yield Act of June 12, 1960 (74 Stat. 215).

(2) Nothing in this Act shall modify the restrictions and provisions of the Shipstead-Nolan Act (Public Law 539, Seventy-first Congress, July 10, 1930; 46 Stat. 1020), the Thye-Blatnik Act (Public Law 733, Eightieth Congress, June 22, 1948; 62 Stat. 568), and the Humphrey-Thye-Blatnik-Andresen Act (Public Law 607. Eighty-fourth Congress, June 22, 1956; 70 Stat. 326), as applying to the Superior National Forest or the regulations of the Secretary of Agriculture.

(3) Nothing in this Act shall modify the statutory authority under which units of the national park system are created. Further, the designation of any area of any park, monument, or other unit of the national park system as a wilderness area pursuant to this Act shall in no manner lower the standards evolved for the use and preservation of such park, monument, or other unit of the national park system in accordance with the Act of August 25, 1916, the statutory authority under which the area was created, or any other Act of Congress whichmight pertain to or affect such area, including, but not limited to, the Act of June 8, 1906 (34 Stat. 225; 16 U.S.C. 432 et seq.); section 3 (2) of the Federal Power Act (16 U.S.C. 796 (2)); and the Act of August 21, 1935 (49 Stat. 666; 16 U.S.C. 461 et seq.).

(b) Except as otherwise provided in this Act, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character. Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.

PROHIBITION OF CERTAIN USES

(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

SPECIAL PROVISIONS

(d) The following special provisions are hereby made:

(1) Within wilderness areas designated by this Act the use of aircraft or motorboats, where these uses have already become established, may be permitted to continue subject to such restrictions as the Secretary of Agriculture deems desirable. In addition, such measures may be taken as may be necessary in the control of fire, insects, and diseases, subject to such conditions as the Secretary deems desirable.

(2) Nothing in this Act shall prevent within national forest wilderness areas any activity, including prospecting, for the purpose of gathering information about mineral or other resources, if such activity is carried on in a manner compatible with the preservation of the wilderness environment. Furthermore, in accordance with such program as the Secretary of the Interior shall develop and conduct in consultation with the Secretary of Agriculture, such areas shall be surveyed on a planned, recurring basis consistent with the concept of wilderness preservation by the Geological Survey and the Bureau of Mines to determine the mineral values, if any, that may be present; and the results of such surveys shall be made available to the public and submitted to the President and Congress.

Mineral leases, claims, etc. (3) Notwithstanding any other provisions of this Act, until midnight December 31, 1983, the United States mining laws and all laws pertaining to mineral leasing shall, to the same extent as applicable prior to the effective date of this Act, extend to those national forest lands designated by this Act as "wilderness areas"; subject, however, to such reasonable regulations governing ingress and egress as may be prescribed by the Secretary of Agriculture consistent with the use of the land for mineral location and development and exploration, drilling, and production, and use of land for transmission lines, waterlines, telephone lines, or facilities necessary in exploring, drilling, producing, mining, and processing operations, including where essential the use of mechanized ground or air equipment and restoration as near as practicable of the surface of the land disturbed in performing prospecting, location, and, in oil and gas leasing, discovery work, exploration, drilling, and production, as soon as they have served their purpose. Mining locations lying within the boundaries of said wilderness areas shall be held and used solely for mining or processing operations and uses reasonably incident thereto; and hereafter, subject to valid existing rights, all patents issued under the mining laws of the United States affecting national forest lands designated by this Act as wilderness areas shall convey title to the mineral deposits within the claim, together with the right to cut and use so much of the mature timber therefrom as may be needed in the extraction removal and beneficiation of the mineral deposits, if needed timber is not otherwise reasonably available, and if the timber is cut under sound principles of forest management as defined by the national forest rules and regulations, but each such patent shall reserve to the United States all title in or to the surface of the lands and products thereof, and no use of the surface of the claim or the resources therefrom not reasonably required for carrying on mining or prospecting shall be allowed except as otherwise expressly provided in this Act: *Provided,* That, unless hereafter specifically authorized, no patent within wilderness areas designated by this Act shall issue after December 31, 1983, except for the valid claims existing on or before December 31, 1983. Mining claims located after the effective date of this Act within the boundaries of wilderness areas designated by this Act shall create no rights in excess of those rights which may be patented under the provisions of this subsection. Mineral leases, permits, and licenses covering lands within national forest wilderness areas designated by this Act shall contain such reasonable stipulations as may be prescribed by the Secretary of Agriculture for the protection of the wilderness character of the land consistent with the use of the land for the purposes for which they are leased, permitted, or licensed. Subject to valid rights then existing, effective January 1, 1984, the minerals in lands designated by this Act as wilderness areas are withdrawn from all forms of appropriation under the mining laws and from deposition under all laws pertaining to mineral leasing and all amendments thereto.

Water resources. (4) Within wilderness areas in the national forests designated by this Act, (1) the President may, within a specific area and in accordance with such regulations as he may deem desirable, authorize prospecting for water resources, the establishment and maintenance of reservoirs, water-conservation works, power projects, transmission lines, and other facilities needed in the public interest, including the road construction and maintenance essential to development and use thereof, upon his determination that such use or uses in the specific area will better serve the interests of the United States and the people thereof than will its denial; and (2) the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture.

(5) Other provisions of this Act to the contrary notwithstanding, the management of the Boundary Waters Canoe Area, formerly designated as the Superior, Little Indian Sioux, and Caribou Roadless Areas, in the Superior National Forest, Minnesota, shall be in accordance with regulations established by the Secretary of Agriculture in accordance with the general prupose of maintaining, without unnecessary restrictions on other uses, including that of timber, the primitive character of the area, particularly in the vicinity of lakes, streams, and portages: *Provided,* That nothing in this Act shall preclude the continuance within the area of any already established use of motorboats.

(6) Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.

(7) Nothing in this Act shall constitute an express or implied claim or denial on the part of the Federal Government as to exemption from State water laws.

(8) Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests.

STATE AND PRIVATE LANDS WITHIN WILDERNESS AREAS

Section 5. (a) In any case where State-owned or privately owned land is completely surrounded by national forest lands within areas designated by this Act as wilderness, such State or private owner shall be given such rights as may be necessary to assure adequate access to such State-owned or privately owned land by such State or private owner and their successors in interest, or the State-owned land or privately owned land shall be exchanged for federally owned land in the same State of approximately equal value under authorities available to the Secretary of Agriculture:

Transfers, restriction. *Provided, however,* That the United States shall not transfer to a State or private owner any mineral interests unless the State or private owner relinguishes or causes to be relinquished to the United States the mineral interest in the surrounded land.

(b) In any case where valid mining claims or other valid occupancies are wholly within a designated national forest wilderness area, the Secretary of Agriculture shall, by reasonable regulations consistent with the preservation of the area as wilderness, permit ingress and egress to such surrounded areas by means which have been or are being customarily enjoyed with respect to other such areas similarly situated.

Acquisition. (c) Subject to the appropriation of funds by Congress, the Secretary of Agriculture is authorized to acquire privately owned land within the perimeter of any area designated by this Act as wilderness if (1) the owner concurs in such acquisition or (2) the acquisition is specifically authorized by Congress.

GIFTS, BEQUESTS, AND CONTRIBUTIONS

Section 6. (a) The Secretary of Agriculture may accept gifts or bequests of land within wilderness areas designated by this Act for preservation as wilderness. The Secretary of Agriculture may also accept gifts or bequests of land adjacent to wilderness areas designated by this Act for preservation as wilderness if he has given sixty days advance notice thereof to the President of the Senate and the Speaker of the House of Representatives. Land accepted by the Secretary of Agriculture under this section shall become part of the wilderness area involved. Regulations with regard to any such land may be in accordance with such agreements, consistent with the policy of this Act, as are made at the time of such gift, or such conditions, consistent with such policy, as may be included in, and accepted with, such bequest.

(b) The Secretary of Agriculture or the Secretary of the Interior is authorized to accept private contributions and gifts to be used to further the purposes of this Act.

ANNUAL REPORTS

Section 7. At the opening of each session of Congress, the Secretaries of Agriculture and Interior shall jointly report to the President for transmission to Congress on the status of the wilderness system, including a list and descriptions of the areas in the system, regulations in effect, and other pertinent information, together with any recommendations they may care to make.

APPENDIX C

THE BUREAU OF LAND MANAGEMENT WILDERNESS REVIEW PROCESS

To carry out the wilderness mandate of FLPMA, the Bureau of Land Management has developed a wilderness review process with three phases: inventory, study, and reporting to Congress.

Inventory: In the wilderness inventory, the BLM examined the public lands, with public participation, and identified those areas that meet the definition of wilderness established by Congress. These areas were identified as wilderness study areas (WSA's). The inventory was completed by November 14, 1980, in the contiguous Western States, resulting in identification of approximately 24 million acres as wilderness study areas and in elimination from further wilderness consideration of approximately 150 million acres.

Study: Each wilderness study area will be studied through the BLM resource management planning system to analyze all values, resources, and uses within the area. The findings of the study, including public participation, determine whether the area will be recommended as suitable or nonsuitable for designation as wilderness. In practice, determining an area's "suitability or nonsuitability ... for preservation as wilderness," in the words of FLPMA, means determining whether the area is more suitable for wilderness designation or more suitable for other uses.

Reporting: When the study has been completed, a recommendation as to whether the wilderness study area is suitable or nonsuitable for designation as wilderness is submitted through the Secretary of the Interior and the President to Congress. A mineral survey will be conducted by the Geological Survey and Bureau of Mines for any area recommended as suitable. Reports on all wilderness study areas must reach the President no later than October 21, 1991, and reach Congress by October 21, 1993. Only Congress can designate an area as wilderness.

APPENDIX D

DEFINITIONS

Some of the terms used in this document have specific meanings and are defined as follows:

Domestic Livestock: Animals kept and managed for their products or for breeding purposes, not visitors' animals or administrative livestock.

FLPMA: The Federal Land Policy and Management

Act of 1976 (Public Law 94-579, 90 Stat. 2743, 43 USC 1701).

Livestock Grazing Operations: Those operations under permit where the primary purpose is the grazing of livestock for the production of food and fiber. Includes pack and saddle stock used in conjunction with such operations.

Mechanical Transport: "Mechanical transport" means any device for transporting personnel or material with wheels, tracks, skids, or by flotation for traveling over land, water, or snow and is propelled by a nonliving power source contained or carried on or within the device.

Motorized Equipment: "Motorized equipment" means any machine activated by a nonliving power source except small battery-powered, handcarried devices such as flashlights, shavers, Geiger counters, and cameras.

Motor Vehicle: "Motor vehicle" means any vehicle which is self-propelled or any vehicle which is propelled by electric power obtained from batteries.

Multiple Use: "...the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." (From Section 103, FLPMA)

Naturalized: Refers to a non-native species of plant or animal which is well established in the area as a part of the wilderness ecosystem and which sustains its population without requiring human assistance (such as stocking or reseeding). Non-native species that are not in equilibrium with the wilderness ecosystem (such as those which are increasing their population and displacing native species) are not considered naturalized.

Naturalness: Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From Section 2(c), Wilderness Act).

Outstanding: Standing out among others of its kind; conspicuous; prominent. Superior to others of its kind; distinguished; excellent.

Permanent Improvement: A manmade structural or nonstructural improvement which will remain at a particular location for more than one field sesson—as differentiated from temporary structures; includes such items as toilet buildings, trails, cabins, signs, fences, vegetative cover manipulation, shelters, and fire grills.

Primitive and Unconfined Recreation: Nonmotorized and nondeveloped types of outdoor recreational activities.

Rangeland Improvements: Any structural or nonstructural improvement which directly affects or supports the use of the forage resource by domestic livestock, such as fences, line cabins, water lines, and stock tanks.

Recreational Livestock: Horses, mules, or burros used for recreational purposes to transport people and/or their supplies.

Solitude: The state of being alone or remote from habitations; isolation. A lonely, unfrequented, or secluded place.

Temporary Structure: Any structure which can be readily and completely dismantled and removed from the site between periods of actual use. It may or may not be authorized at the same site from season to season or from year to year.

Unnecessary or Undue Degradation: Surface disturbance greater than what would normally result when an activity is being accomplished by a prudent operator in usual, customary, and proficient operations of similar character and taking into consideration the effects of operations on other resources and land uses, including those resources and uses outside the area of operations. Failure to initiate and complete reasonable mitigation measures, including reclamation of disturbed areas, or creation of a nuisance may constitute unnecessary or undue degradation. Failure to comply with applicable environmental protection statutes and regulations thereunder will constitute unnecesary or undue degradation.

Visitor Use: Visitor use of the wilderness resource for inspiration, stimulation, solitude, relaxation, education, pleasure, or satisfaction.

Wilderness: The definition contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891). (See Appendix B for its full text.)

Wilderness Characteristics: The definition contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891. (See Appendix B for its full text.)

APPENDIX NO. 3

MANAGEABILITY ASSESSMENT

Based on the wilderness values of each WSA described in Chapter 3 and the impacts of anticipated management actions analyzed in Chapter 4, BLM's ability to preserve wilderness values (manageability) of each WSA has been determined as follows:

NEEDLE'S EYE

The Needle's Eye WSA would be manageable under all alternatives except *No Wilderness*. Under *No Wilderness (No Action)* wilderness values would be impacted by construction of a ranch road in the eastern part of the WSA.

BLACK ROCK

Under *All Wilderness* the eastern part of the recommended area would not be manageable as wilderness due to development of the fluorspar mine north and east of Jackson Mountain. Under *Enhanced Wilderness, Moderate Wilderness* and the *Proposed Action*, the recommended area would be manageable. Wilderness values under *No Wilderness (No Action)* would be adversely impacted by the fluorspar mine.

FISHHOOKS AND DAY MINE

The recommended area would be manageable as wilderness under all alternatives.

GILA BOX

The recommended area would be manageable as wilderness under all alternatives. Under *No Wilderness (No Action)*, ORV use of the river canyons would impact opportunities for solitude and primitive recreation when vehicles used the canyon during periods of low water flow.

TURTLE MOUNTAIN

The northern part of the recommended area may not be manageable as wilderness under *All Wilderness* and *Enhanced Wilderness* due to a request for access to the state inholding. It is difficult to project, with certainty, the impacts of this request because the BLM is only required to provide adequate access to inholdings, not necessarily road access. If vehicle access by road is the only reasonable access to the state inholding to serve the purposes of the state and its lessees, the northern part of the recommended area would not be manageable as wilderness. If it is determined that foot or horseback access is adequate and reasonable, then the area recommended for wilderness would be manageable.

Under the *Proposed Action, Moderate Wilderness* and *No Wilderness (No Action)*, the WSA would not be manageable as wilderness because construction of livestock management facilities would leave the WSA in an unnatural condition. The WSA currently has so many evidences of man's work that the addition of these facilities would cumulatively bring the impact of man's work to a noticeable level.

JAVELINA PEAK

The southern part of the WSA would not be manageable as wilderness under *All Wilderness, Moderate Wilderness, Proposed Action* and *No Wilderness (No Action)* due to uncontrollable ORV use on the dunes. Under *Enhanced Wilderness* most of the ORV use areas would be excluded and the area recommended for wilderness would be manageable.

PELONCILLO MOUNTAINS

The WSA would be unmanageable as wilderness under all alternatives due to potential incompatible adjacent land uses caused by highly irregular wilderness boundaries.

DOS CABEZAS MOUNTAINS

The western part of the WSA in Buckeye Canyon would not be manageable as wilderness under *All Wilderness* and *No Wilderness* due to mineral exploration and development of the Buckeye and Apache Mines. Under *Enhanced Wilderness, Moderate Wilderness* and the *Proposed Action*, the recommended area would be manageable as wilderness.

APPENDIX NO. 4

IMPACTS TO PUBLIC ATTITUDES AND PERCEPTIONS

PROPOSED ACTION

The *Proposed Action* would designate portions of the Needles Eye, Black Rock, Fishhooks and Dos Cabezas Mountains WSAs. Although this alternative eliminates many resource use conflicts, wilderness designation would still generate opposition from local and county residents.

ALL WILDERNESS

Interviews with residents of the five counties in the EIS area reveal that few local or county residents support additional wilderness. Some residents expressed no real support or opposition to wilderness, only the belief that BLM would decide regardless of their knowledge or contributions.

The basis of general opposition to wilderness is formed from several common feelings expressed by country residents. They fear the adverse impacts of wilderness on mining and ranching. They also think that adequate amounts of wilderness already exist and no more is needed. Additional areas would only attract "outsiders" to "their lands". Finally, area residents could not associate any benefits with wilderness designation. They were, however, aware of the cost to the government to conduct the wilderness review.

All Wilderness would not significantly affect the attitudes and perceptions of local or county residents toward the BLM and wilderness. Most residents will continue to oppose wilderness designation.

ENHANCED WILDERNESS

Because this alternative designates all or portions of every WSA under study as wilderness and 75 percent of the acreage proposed for designation under *All Wilderness*, it would generate essentially the same opposition by local and county residents as would *All Wilderness*.

MODERATE WILDERNESS

Although *Moderate Wilderness* would designate only five WSAs as wilderness, it still would include such controversial areas as the Gila Box WSA, location of the proposed Camelsback Dam. Opposition from residents of the four Arizona counties would still be strong.

NO WILDERNESS

While many residents of the local communities and the counties would be pleased with no additional wilderness areas, this alternative would not significantly alter their attitudes and perceptions toward wilderness. Because the population centers represent such a broad spectrum of attitudes toward wilderness, some residents would be pleased with no additional wilderness and others would be displeased. Overall, this alternative would not significantly affect the attitudes and perceptions of the residents of the population centers.

CONCLUSION. Public attitudes and perceptions toward wilderness would not be significantly affected by any of the alternatives.

GLOSSARY, REFERENCES, AND INDEX

GLOSSARY

ADMINISTRATIVELY ENDORSED WILDERNESS AREA. An area that the President of the United States has recommended to Congress as suitable for wilderness designation.

AIR QUALITY CLASSES. Classes established by the Environmental Protection Agency that define the amount of air pollution considered significant within an area. Class I applies to areas where almost any change in air quality would be considered significant; Class II applies to areas where the deterioration normally accompanying moderate well-controlled growth would be considered insignificant; and Class III applies to areas where deterioration up to the national standards would be considered insignificant.

ALLOTMENT. A land area where one or more operators graze their livestock. It generally consists of public land but may include parcels of private and state-owned lands. The number of livestock and season of use are stipulated for each allotment.

ALLOTMENT MANAGEMENT PLAN (AMP). A livestock grazing management plan for a specific allotment, based on multiple-use resource management objectives. The AMP considers livestock grazing in relation to other uses of the range and in relation to renewable resources — watershed, vegetation, and wildlife. An AMP establishes the seasons of use, the number of livestock to be permitted on the range and the rangeland developments needed.

ANIMAL UNIT. considered to be one mature (1,000 pounds) cow or the equivalent based upon average daily forage consumption of 26 pounds dry matter. (Range Term Glossary Committee 1974.)

ANIMAL UNIT MONTH (AUM). The amount of forage needed to sustain one cow or its equivalent for one month.

ANNUAL (EPHEMERAL) PLANT. A plant that completes its life cycle and dies in one year or less. (Range Term Glossary Committee 1974.)

ANOMALY. A deviation from uniformity. A feature considered capable of being associated with commercially valuable mineral deposits.

AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC). A public land area where special management attention is needed to protect life and safety from natural hazards or to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife or natural systems or processes.

BORROW PIT. A ditch beside a constructed road, literally the hole from which the dirt to build the road was "borrowed."

CATCHMENT. A structure built to collect and retain rainwater from an upstream drainage area. It typically consists of a gently sloping impervious surface (apron) onto which rainwater collects before flowing into a storage tank. A slickrock catchment uses a natural slickrock surface as an apron.

CENSUS COUNTY DIVISION (CCD). A county division used by the Bureau of Census for listing some census data.

CHERRYSTEM ROAD. A dead-end road extending into and surrounded by a wilderness study area (WSA) but not within its boundaries. Such roads may lead to range developments, mines or inholdings. Cherrystemming is the delimiting of WSAs to exclude cherrystem roads.

CLIMAX. The final stable community in an ecological succession, which can reproduce itself indefinitely under existing conditions.

COCHISE CULTURE. Prehistoric culture of southeast Arizona and southwest New Mexico believed to have begun over 10,000 years ago and have lasted until 500 B.C. or later. The Cochise culture's economy was based on gathering wild plant foods and hunting small game. Settlements were temporary.

COLOR. One of the four basic elements of visual resources, color is a phenomenon of light or visual perception that enables one to distinguish between otherwise identical objects, a hue as contrasted with black, white or gray. As perceived in the landscape, color is usually most predominant in the vegetation but may be expressed in the soil, rocks, or water and may vary which time of day, time of year and weather. (See Form, Line and Texture.)

CRITICAL MINERALS. Minerals essential to the national defense of the United States which, though difficult to procure, are easier to procure than strategic minerals because critical minerals can be domestically produced, obtained in more adequate quantities or area less essential than strategic minerals. Nevertheless, critical minerals need some degree of conservation and distribution control. (See Strategic Minerals.)

CULTURAL RESOURCE INVENTORY. A descriptive listing and documentation of cultural resources, including photographs and maps; the processes of locating, identifying, and recording sites, structures, building objects and districts through library and archival research; information from persons knowledgeable about cultural resources; and on-the-ground field surveys of varying levels of intensity. (See Cultural Research Inventory Classes.)

CULTURAL RESOURCE INVENTORY CLASSES. Class I — library, archival, and literature research with consultation to identify known cultural resources. Class II — a sampling field inventory of an area, systematically designed to provide a predictive model of the nature and distribution of the cultural resources in an area. Class III — an intensive field search of all surface-evident cultural resources in an entire area.

CULTURAL RESOURCES. Those fragile and nonrenewable remains of human activity, occupation or endeavor, reflected in districts, sites, structures, buildings, objects, artifacts, ruins, works of art, architecture and natural features that were of importance in past human events. These resources consist of: (1) physical remains, (2) areas where significant human events occurred, even though evidence of the event no longer remains and (3) the environment immediately surrounding the actual resource.

CULTURAL RESOURCE SITE. A physical location of past human activities or events. Sites vary in size, ranging from the location of a single cultural resource object to a cluster of a cultural resource structures with associated objects and features.

"CUSTODIAL" GRAZING MANAGEMENT CATEGORY. One of three grazing management categories. "Custodial" grazing management is employed when the percentage of public land is small, when public land is scheduled to be transferred from public ownership or when other conditions are not conducive to other management. Under custodial management, an allottee is not required to follow a specified grazing system. BLM licenses custodial allotments only from the capacity of the public land but does not control overall livestock numbers. (Also see "Improve" and "Maintain" Grazing Management Category.)

ECOLOGICAL SUCCESSION. See Succession, Ecologic.

ECONOMIC MINERAL DEPOSIT. Any mineral deposit of sufficient quality and quantity to produce a profit when mined. See Subeconomic Mineral Deposit.

ECOSYSTEM. A complex self-sustaining natural system, which includes living and nonliving components of the environment and the interactions that bind them together. Its functioning involves the circulation of matter and energy between organisms and their environment.

ENDANGERED ANIMAL SPECIES. Any animal species in danger of extinction throughout all or a significant portion of its range. This definition excludes species of insects that the Secretary of the Interior determines to be pests and whose protection under the Endangered Species Act would present an overwhelming and overriding human risk.

ENDANGERED PLANT SPECIES. Species of plants in danger or extinction throughout all or a significant portion of their ranges. Existence may be endangered because of the destruction, drastic change or severe curtailment of habitat, or because of over-exploitation, disease, predation or unknown reasons. Plant taxa from highly limited areas, such as the type localities only, or from restricted fragile habitats are usually considered endangered. See Threatened Plant Species.

ENVIRONMENT. The surrounding conditions, influences or forces that affect or modify an organism or an ecological community and ultimately determine its forms and survival.

ENVIRONMENTAL ASSESSMENT (EA). The procedure for analyzing the impacts of some proposed action on a given environment and the documentation of the analysis. An EA is similar to an environmental impact statement (EIS) but is generally smaller in scope. An EA may be preliminary to an EIS.

ENVIRONMENTAL IMPACT STATEMENT (EIS). An analytical document developed for use by decision-makers to weigh the environmental consequences of a potential decision. An EIS should accurately portray potential impacts on the human environment of a particular course of action and its possible alternatives.

EXCLOSURE. A small area set aside and protected from grazing either to preserve respresentative areas in excellent range condition or to allow succession on depleted rangeland without grazing (Rangeland Reference Area Committee 1975).

FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976 (FLPMA). Public law 94-579 gives BLM the legal authority to establish public land policy; to establish guidelines for administering such policy; and to provide for the management, protection, development and enhancement of the public lands.

FORM. One of the four basic elements of visual resources, form is generally considered to be the mass or shape of an object. It is most strongly expressed in the shape of the land surface. Form is usually the result of erosion, but it may also be reflected in the shape of the openings or changes in vegetation or in the structures on the landscape. (See Color, Line and Texture.)

FOSSIL. Any remains, trace or imprint of an ancient plant or animal that has been preserved by natural processes.

GRANDFATHERED USE. A mineral, grazing or right-of-way use that occurred on the land on the date of approval of the Federal Land Policy and Management Act (FLPMA) (October 21, 1976). Under BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review (BLM 1979a), grandfathered uses may continue on lands under wilderness review in the same manner and degree as on the date of FLPMA's approval, even if such uses impair wilderness suitability. These uses, however, must be regulated to ensure that they do not unnecessarily degrade these lands.

GRAZING SYSTEM. The manipulation of livestock grazing to accomplish desired results (Range Term Glossary Committee 1974).

HABITAT. A specific set of physical conditions that surround a single species, a group of species or a large community. In wildlife management, the major components of habitat are considered to be food, water, cover and living space.

HISTORIC RESOURCES. Cultural resources that date after the arrival of Europeans in the Southwest (about A.D. 1700 to the present).

"IMPROVE" GRAZING MANAGEMENT CATEGORY. One of the three grazing management categories. The "Improve" category includes those allotments in unsatisfactory condition, with production potential higher than present levels, with resource-use conflicts or with unsatisfactory management. BLM intensively monitors the range to detect the results of improve grazing management, and allotment management plans are implemented. (Also See "Custodial" and "Maintain" Grazing Management Category.)

INHOLDING. A parcel of State or private land surrounded by a wilderness study area.

INTERIM MANAGEMENT POLICY (IMP). BLM's guidelines for managing lands under wilderness review so as not to impair their suitability for preservation as wilderness. The IMP will apply to these lands until Congress determines whether or not they are to be wilderness.

KEY AREAS (CULTURAL RESOURCES). Areas that contain or are believed to contain significant cultural resources and are therefore sensitive to land use actions.

LAND TENURE PLAN. A plan developed by BLM to show the potential for blocking land ownership for better management and control.

LEACHING. Extracting a soluable metallic compound from an ore by selectively dissolving it in a suitable solvent, such as water, sulfuric acid or hydrochloric acid.

LINE. One of the four basic elements of visual resources, line in the natural landscape is usually the result of an abrupt contrast in form, texture or color. Lines may be found as ridges, skylines, structures, as changes in vegetation types or as individual trees or branches. (See Color, Form and Texture.)

LINE CABIN. A cabin, shack or other structure temporarily used as shelter by livestock operators and their help while looking after their livestock on the range.

LITHIC SITE. An archaeological site containing stone tools or debris left from the manufacture, use or maintenance of flakes stone tools.

LOCATABLE MINERAL. Any mineral that can have a mining claim filed on it under the Mining Law of 1872 as amended.

LOCATION. The act of fixing the boundaries of a mining claim according to law.

MAGNETIC ANOMALY. A magnetic reading either higher or lower than would be expected for an area. A high anomaly could indicate the presence of high concentrations of iron and associated minerals, and a low reading could indicate the replacement of iron by another mineral. In either case, a magnetic anomaly can suggest mineral potential.

"MAINTAIN" GRAZING MANAGEMENT CATEGORY. One of three grazing management categories. The "Maintain" category includes those allotments already in satisfactory condition that provides for no special programs or changes in existing management. Under maintained management, BLM monitors the range to detect undesirable conditions, and allotment management plans can be implemented if desired. (Also See "Custodial" and "Improve" Grazing Management Category).

MANAGEMENT FRAMEWORK PLAN (MFP). A public land use plan that provides a set of goals, objectives and constraints for a specific planning area. This plan guides the development of detailed plans for the management of each resource in the planning area.

MANAGEMENT SITUATION ANALYSIS (MSA). A step in the BLM process that identifies existing management, physical resources and opportunities to meet the needs, concerns and issues identified through resource management planning. The MSA results in a reference document, also referred to as an MSA, which is kept in the resource area office. The MSA document is open for public inspection but is not distributed to the public.

MINERALIZATION. The processes taking place in the earth's crust resulting in the formation of valuable minerals or ore bodies; the occurrence of potentially valuable minerals.

MINERALIZED AREA. An area that has exposures or near-surface deposits of potentially valuable minerals.

MINING DISTRICT. A section of country, usually designed by name, which has described or understood boundaries where minerals are found and mined under rules and regulations prescribed by the miners, consistent with the Mining Law of 1872.

MOGOLLON CULTURE. A prehistoric culture in west central and southwest New Mexico and east central and southeast Arizona that was largely contemporaneous with the Anasazi and Hohokam (300 B.C. — A.D. 1200) and shared some traits with both cultures, particularly the Anasazi. The Mogollon economy was to a great extent based on agriculture and the gathering of wild plant foods.

NATIONAL HISTORIC PRESERVATION ACT (NHPA). The primary federal law providing for the protection and preservation of our cultural resources. Making it a national policy to preserve our cultural heritage, NHPA established the National Register of Historic Places, the Advisory Council on Historic Preservation, and State Historic Preservation Officers.

NATIONAL REGISTER OF HISTORIC PLACES (NRHP). A list, kept by the Secretary of the Interior, of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology and culture.

NATIONAL REGISTER QUALITY SITE. A cultural resource site determined to be eligible for nomination to the National Register of Historic Places by virtue of its local, State or national significance.

NATURAL AREA. Lands managed for retention of their typical or unusual plant or animal types, associations or other biotic phenomena, or their outstanding scenic, geologic, soil or aquatic features or processes.

NATURALNESS. Quality of generally appearing to have been affected primarily by the forces of nature, with human influence largely unnoticeable.

NONATTAINMENT AREA (AIR QUALITY). An area where the national ambient air quality standards are violated for a given pollutant. An area may be classed on a nonattainment level for one pollutant and on an attainment level for another.

OFF-ROAD VEHICLE (ORV). Any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland or other natural terrain, excluding (1) any registered motorboat, (2) any fire, military, emergency, or law enforcement vehicle when used for emergencies and any combat or combat support vehicle when used for national defense, and (3) any vehicle whose use is expressly authorized by the respective agency head under a permit, lease, license or contract.

ORE. A mineral deposit of high enough quality to be mined at a profit.

OUTSTANDING. Standing out among others of its kind; conspicuous, prominent or superior to others of its kind; distinguished; excellent.

OUTSTANDING NATURAL AREAS. Natural areas established to preserve scenic values and areas of natural wonder.

OVERBURDEN. The earth and rock lying in a natural state above mineral deposits before excavation.

OVERTHRUST BELT (ZONE). An extensive zone in western North America (believed to extend from Canada to Mexico), where an overthrust fault has forced older rocks on top of younger rocks. The discovery of oil and gas in the younger rock layers has aroused much interest in exploration throughout the belt, including Arizona.

PALEONTOLOGY. The science that deals with the life of past geologic ages. It is based on the study of the fossil remains of organisms and in a restricted sense is the study of fossils.

PALEONTOLOGICAL RESOURCES. Fossils; the remains of animals and plants that provide information about life in past geologic ages.

PERENNIAL STREAM. A stream that flows throughout the year.

PLACER DEPOSIT. An alluvial or glacial deposit, as of sand or gravel, containing particles of gold or other valuable minerals.

PLIOCENE. The geologic epoch at the end of the Tertiary period, which lasted from 12 million to one million years ago.

PREHISTORIC RESOURCES. Cultural resources that predate the arrival of Europeans in the Southwest (about A.A. 1700).

PRIMITIVE AND UNCONFINED RECREATION. Nonmotorized, nondeveloped types of outdoor recreation, which can be dispersed and do not require facilities. Some examples are hiking, backpacking, fishing, hunting, spelunking, horseback riding, rock climbing, river running, cross-country skiing, snowshoeing, canoeing, photography and nature study.

PROSPECT. An attempt to determine mineral values or the site of this attempt.

PUBLIC LAND. Federal lands administered by the Bureau of Land Management.

RANGE (RANGELAND). Land dominated by vegetation that can be grazed or browsed and whose husbandry is provided routinely through grazing management instead of renovation or cultural treatment (Range Term Glossary Committee 1974).

RANGELAND CONDITION. The current productivity of a range relative to what that range is naturally capable of producing (Range Term Glossary Committee 1974).

RANGELAND TREND. The direction of change in rangeland condition (Range Term Glossary Committee 1974).

RAPTOR. A bird of prey.

RECREATION VISITOR DAY. Twelve visitor hours, which may be aggregated continuously, intermittently or simultaneously by one or more people.

RESEARCH NATURAL AREA. A natural area established and maintained for research and education, which may include: (1) typical or unusual plant or animal types, or associations or other biotic phenomena or (2) characteristic or outstanding geologic, soil, or aquatic features or processes. The public may be excluded or restricted from such areas to protect studies.

RESOURCE AREA. The smallest administrative subdivision of a BLM district.

REST-ROTATION GRAZING. A grazing system in which one part of the range is ungrazed for an entire year or longer, while other parts are grazed for a portion or all of a growing season.

RIPARIAN. Situated on or pertaining to the bank of a river, stream or other body of water. The term riparian is normally used to refer to the plants of all types that grow along streams or around springs.

ROADLESS. The absence of roads that have been improved and maintained by mechanical means to ensure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road. (See Vehicle Way.)

ROCK SCRAMBLING. Climbing up, down and over rocks without the use of ropes or other special equipment.

SALADO CULTURE. A prehistoric culture that probably originated in the Tonto Basin of Arizona and spread throughout southeast Arizona from about 1200 to 1450 A.D. The Salado economy was based on agriculture.

SCOPING. An early and open process for determining the scope of issues to be addressed in an EIS and for identifying the significant issues related to a proposed action. Scoping may involve public meetings, field interviews with representatives of agencies and interest groups, discussions with resource specialists and managers and written comments in response to news releases, direct mailings and articles about the proposed action and scoping meetings.

SECTION. A 1-square mile area forming one of the 36 subdivisions of a township.

SENSITIVE ANIMAL SPECIES. Animals whose populations are consistently small and widely dispersed or whose ranges are restricted to a few localities, such that any appreciable reductions in numbers or habitat might lead toward extinction.

SHERD. A fragment of a pottery vessel.

SLICKROCK CATCHMENT. See Catchment.

SOLITUDE. The state of being alone or remote from habitations; isolation.

SPECIAL FEATURES. Resources that are not required for an area to be designated wilderness but that are considered in assessing the wilderness potential of an area. Such values include ecologic, geologic and other features of scientific, educational, scenic or historic value.

STANDARD METROPOLITAN STATISTICAL AREA (SMSA). A county that contains at least one city of 50,000 residents or more and as many adjacent counties as are metropolitan in character and are socially integrated with that central city or cities.

STRATEGIC MINERALS. Minerals essential to the national defense, for the supply of which the United States is wholly or in part dependent upon sources outside its continental limits and for which strict measures are needed to control conservation and distribution. (See Critical Minerals.)

SUBECONOMIC MINERAL DEPOSIT. A known mineral deposit of sufficient quantity but insufficient quality to be mined at a profit under present conditions. (See Economic Mineral Deposit.)

SUCCESSION, ECOLOGIC. The process of one plant community being placed by another until a climax community is reached.

TAXA. Categories in the classification of plants and animals.

TEMPERATURE (GEOTHERMAL) GRADIENT. The rate at which temperatures increase with depth below the earth's surface. For example, a temperature gradient of 164° C/km means that 1 km below the earth's surface the temperature is 164° C higher than at the surface. Under a temperature gradient of 164° C/km, for every 20 feet in depth, temperatures increase by 1°C or 1.8°F.

TEXTURE. One of the four basic elements of visual resources, texture is the result of the size, shape and placement of parts; their uniformity and the distance from which they are observed. As perceived in the landscape, texture is usually the result of vegetation patterns but may also result from erosion patterns in rocks or soil. (See Line, Form and Color.)

THREATENED ANIMAL SPECIES. Any animal species likely to become endangered within the foreseeable future throughout all or a significant part of its range. (See Endangered Animal Species and Sensitive Animal Species.)

THREATENED PLANT SPECIES. Species of plants that are likely to become endangered within the foreseeable future throughout all or a significant portion of their ranges, including species classed as rare, very rare or depleted. (See Endangered Plant Species.)

UTILIZATION (FORAGE). The proportion of the current year's forage consumed or destroyed by grazing animals.

VEGETATION TYPE. A plant community with distinguishable characteristics described by the dominant vegetation present.

VEHICLE WAY. A vehicle route established and maintained solely by the passage of motor vehicles.

VISUAL RESOURCE MANAGEMENT (VRM) CLASSES. Classification containing specific objectives for maintaining or enhancing visual resources, including the kinds of structures and modifications acceptable to meet established visual goals.

VOLCANIC PLUG (NECK). The solidified rock filling a vent or pipe or a dead volcano. Volcanic plugs often become prominent landscape features after the softer surrounding material has eroded away.

WATERSHED. The region draining into a river, river system, or body of water.

WAY. See Vehicle Way.

WILD AND SCENIC RIVERS SYSTEM. A system established by the Wild and Scenic Rivers Act (Public Law 90-542) of protecting rivers and their immediate environments that have outstanding remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values.

Rivers studied for these values can be designated in one of three classes:

1) *Wild Rivers* — free of impoundments and pollution and generally inaccessible except by trail, with essentially primitive watersheds or shorelines.
2) *Scenic Rivers* — free of impoundments, shorelines largely undeveloped, but accessible in places by roads.
3) *Recreational Rivers* — readily accessible by road or railroad, may have some development along shorelines and may have undergone some impoundment or diversion in the past.

WILDERNESS. An uncultivated, uninhabited and usually roadless area set aside for preservation of natural conditions. According to Section 2(c) of the Wilderness Act of 1964, "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the force of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value."

WILDERNESS AREA. An area formally designated by Congress as part of the National Wilderness Preservation System.

WILDERNESS STUDY AREA (WSA). A roadless area or island that has been inventoried and found to have wilderness characteristics as described in section 603 of the Federal Land Policy and Management Act and section 2(c) of the Wilderness Act of 1964.

WILDLIFE WATERS. Artificial sources of water for wildlife, including a variety of projects such as catchments, masonry dams with storage tanks and drinkers and spring developments. Water for wildlife may even be piped off existing livestock storage tanks.

WITHDRAWAL. An action that restricts the use of public land and segregates the lands from the operation of all or some of the public land or mineral laws.

YEARLONG GRAZING. Continuous grazing for a 12-month period or for a calendar year.

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